

Nebraska Relay FCC Certification Renewal and Supporting Documents

Introduction

Nebraska Relay, a program under the Nebraska Public Service Commission, in the state of Nebraska, has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the FCC Public Notice DA 17-697, CG Docket No. 03-123 released on July 19, 2017. Included in the Public Notice are the minimum mandatory FCC Telecommunications Relay Service (TRS) requirements under 47 C.F.R. §64.604 and §64.606. A copy of this Public Notice and these mandatory requirements are attached as Appendix A. Nebraska Relay prepared this TRS Certification Renewal Application with the assistance of Sprint Accessibility (formerly Sprint Relay).

The Nebraska Public Service Commission contracted with Sprint Accessibility to provide Telecommunications Relay Service effective to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the Certification of Operation of TRS that was issued September 2015. All of the minimum mandatory TRS requirements are listed in **Appendix B.** Please note that although Sprint Accessibility provides Internet Protocol (IP) and Captioned telephone (CapTel) web-based services, Nebraska Relay does not contract to provide these services in Nebraska, nor is Nebraska Relay responsible for oversight of IP and VRS or to other Internet- or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing TRS and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.

CA Employment Standards

The Nebraska Public Service Commission with Sprint Accessibility to provide the hiring, training and oversight of Communications Assistants (CAs) for Nebraska Relay. Sprint Accessibility has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint Accessibility's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures the applicant has at least a 12th--grade level of English grammar and spelling skills, the ability to type 60 words-per-minute (wpm) on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language (ASL), or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history. After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements. A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment. Sprint Accessibility TRS CA applicants are required to pass a valid and unbiased 12th-grade level spelling test to be considered for employment. Sprint Accessibility TRS CA applicants must pass a valid unbiased 12th-grade level grammar test to be considered for employment. Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality. If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational. work and criminal histories.

This process ensures only qualified applicants are hired to work at Sprint Accessibility centers as a CA.

Sprint Accessibility provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint Accessibility requires all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint Accessibility ensures all CapTel CAs are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

CapTel CA Trainees spend 2-3 weeks training in a classroom setting.

- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel CAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel CA or an Instructor.
- All CapTel CAs must continue to qualify for live call handling each month.
- Sprint Accessibility CapTel CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel CA is evaluated on a minimum of one call each shift.
- There is also a monthly test each CapTel CA must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Relay Nebraska , through their contract with Sprint Accessibility, has shown Sprint Accessibility CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint Accessibility requires all CAs to possess clear and articulate voice communications. CAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint Accessibility CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint Accessibility CAs must type 60 wpm prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint Accessibility's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint Accessibility's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.
- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint Accessibility provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete STS specialized STS training program including a written evaluation.
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint Accessibility's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories. STS

applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS. Sprint Accessibility's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls. The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy. The STS training outline is displayed in the following figure:

	STS TRAINING OUTLINE					
	Sprint Accessibility Values and Goals					
Tra	aining Agenda					
Ŀ	Objectives / Training Outline Introduction and History	:	Speech-Disabilities Attributes of Speech-to-Speech Relay CAs			
	Video	•	Speech-to-Speech verses Traditional Relay			
-	Service Description	•	FCC Requirements			
-	Characteristics of Customers	•	Speech-to-Speech Variations			
-	Stereotypes	•	Assessment			
W	ork Performance Components					
-	Basic Call Processing	•	Confidentiality			
-	Call set up	•	Transparency			
-	Customer Database	•	Personal Conversations			
-	Frequently Dialed Numbers	•	Developmental Skill Practice			
-	Customer Requests	•	Audio			
-	Emergency Call Processing	•	Observation			
Pa	rticipation					
-	CA training	•	Call Focus			
 Taking over calls – 15 minute 		•	Teamwork – support peer			
-	CA work performance					
Cc	onfidentiality and Transparency					
-	Discuss call speech patterns	•	Unacceptable to:			
-	Discuss techniques customer uses	•	Have conversation regarding information			
-	Have two CAs on one call, if necessary or		discussed on calls			
	customer requests.	•	Discuss customers in general			

All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and speech-disabled cultures. Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel Operator Trainees are screened on several skill sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition CapTel CAs must be able to recognize a mistake in voicerecognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

CA Quality Assurance Programs

Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Accessibility Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in five Relay Centers across the country. This team along with the support of the Location Managers, Supervisors, and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint Accessibility listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Accessibility does not develop training and consumer education programs for the Telecommunications Relay service alone. Sprint Accessibility contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

The Nebraska Public Service Commission contracts with Sprint Accessibility to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint Accessibility conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint Accessibility's CAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact almost a third of Sprint Accessibility's CAs type over 90 wpm!

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

The Nebraska Public Service Commission does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint Accessibility no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint Accessibility, Nebraska Relay exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint Accessibility, calls are not taken over unless it is absolutely necessary to do so. Sprint Accessibility CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of 10 minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA,
- Call requires a specialist (STS, Spanish, other),
- CA illness.

- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of 10 or 15 minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
 - Sprint Accessibility attempts to honor any requests for a specific gender during call transitions.
 - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

As stated in section §64.604 (a)(1) (v), Nebraska Relay honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. Nebraska Relay uses Sprint Accessibility's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros
- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English and Spanish. CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

The Nebraska Public Service Commission contracts with Sprint Accessibility to oversee all TRS CAs, including CapTel CAs for the State of Nebraska. In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes. The only exception to this policy relates to STS calls. Nebraska Relay STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Nebraska Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint Accessibility strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Accessibility Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Accessibility Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.

- Assure maximum user control.
- Continuously improve their skills.

Nebraska Relay CapTel CAs must comply with the same rules TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only. Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A CapTel agent may have problems, complaints or stress from handling the call. The CA may ask to speak to a supervisor or other member of management (as long as it was not their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any CA who breaks this policy will be disciplined, up to and including termination. Please see Appendix C for the TRS pledge of confidentiality.

STS Limited Exception of Retention of Information

At the request of a caller, Nebraska Relay STS CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see Appendix C for the TRS Pledge of Confidentiality form.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Nebraska Relay CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: Sprint Accessibility puts control of the call with the users.

- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.

- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the relay user, Nebraska Relay CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training and throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

Nebraska Relay CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Nebraska does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

STS Facilitation of Communication

Nebraska Relay STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Nebraska Relay STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint Accessibility understands each STS user may also find one technique to be most comfortable. Sprint Accessibility STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible. Nebraska Relay STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" guestions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

To ensure STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS

CA work area to monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Nebraska Relay provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computer users to place local, intrastate, interstate, and international calls. Nebraska Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Nebraska Relay retain full control of the length and number of calls placed anytime through relay. Nebraska Relay CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call CapTel users dial sequential calls directly therefore it is not possible for a CapTel CA to refuse sequential calls or limit length of calls. Nebraska Relay CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

The following information is applicable for the timeframe through May 31, 2017:

Relay Nebraska, through Sprint Accessibility, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint Accessibility processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Nebraska Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Nebraska Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Nebraska Relay works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

The following information is applicable beginning June 1, 2017:

As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering <u>domestic and international calling at no charge</u> with no long distance fees or long distance call billing for all TRS and CTS users through Nebraska Relay service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Nebraska Relay and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users as is done for traditional phone users (i.e., non-relay callers).
- Payphones: Sprint will <u>provide domestic and international calling at no charge</u> for Nebraska Relay callers using payphones.
- International Locations: Sprint will provide <u>outbound international calling at no charge</u> for TRS and CTS users. Inbound access is available with customers being charged.
- Directory Assistance: Sprint is offering <u>access to Directory Assistance at no charge</u> for Nebraska Relay Service.
- Pay Per Call Services: Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3) (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

The following information is applicable for the timeframe through May 31, 2017:

If a long distance provider declines to complete a call because credit authorization is denied, Sprint Accessibility will relay the message verbatim to the relay user and follow the user's instructions.

The following information is applicable beginning June 1, 2017:

Due to the waiver described in the previous question, long distance billing is no longer applicable. Sprint is offering <u>domestic and international calling at no charge</u> with no long distance fees or long distance call billing for all TRS and CTS users through Nebraska Relay service.

§64.604 (3) (iv) Relay services shall be capable of handling pay-per-call calls.

The following information is applicable for the timeframe through May 31, 2017:

Sprint Accessibility was the first provider to process pay-per-calls, beginning in 1996. Callers to Nebraska Relay access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

The following information is applicable beginning June 1, 2017:

Due to the previously described waiver, Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Nebraska Relay provides access to all available relay call types. Through the state's contact with Sprint Accessibility, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Standard services provided by Nebraska Relay are:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA
- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Nebraska Relay CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

Nebraska Relay's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line. Nebraska Relay adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the perminute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

Speed Dialing Functionality

Nebraska Relay's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile.

Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated 10-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel phone is equipped with the ability to program in three speed dial numbers and a recently dialed number.

Three-Way Calling

Nebraska Relay provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to tie the third party directly into the conversation or to tie the third party in by making a second call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her LEC can use this feature when placing a call through Nebraska Relay. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

Nebraska Relay provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voicemail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Nebraska Relay, through Sprint Accessibility, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint Accessibility's hot key sends text to the user which says "(RECORDING)." Sprint Accessibility's hot keys are available in all supported languages, including English and Spanish. Nebraska Relay has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Nebraska Relay does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint Accessibility's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a

combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint Accessibility's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

Nebraska Relay CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Retrieving Answering Machine and Voice Mail Messages

Nebraska Relay has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint Accessibility's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's
 instructions. Sprint Accessibility will use the touch-tone capability embedded in Sprint
 Accessibility's Phoenix software to enter access codes or system commands to retrieve
 new messages, play all messages, save messages, and/or delete messages (depending
 on customer instructions).
- If necessary, Nebraska Relay CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail, and recordings which redials the call so the end user is not imposed charges for additional calls. The following information is applicable for the timeframe through May 31, 2017: If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call. The following information is applicable beginning June 1, 2017: Sprint is offering domestic and international calling at no charge with no long distance fees or long distance call billing for all TRS and CTS users through Nebraska Relay service.
- Sprint Accessibility's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Like TRS users, Relay Nebraska's CapTel users can retrieve answering machine messages from an answering machine near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Nebraska Relay accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint Accessibility, Nebraska Relay has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 911 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Nebraska Relay uses the following procedures to ensure TRS users needing emergency services receive prompt assistance with their call.

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1.	Nebraska Relay CAs act upon the word "emergency". Calls placed to fire, police, ambulance, and rescue squads are considered emergency calls.
2.	The CA hits a Phoenix function key (hot key) which designates the call as an Emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (telephone number) is passed to the E911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Nebraska Relay Service. They are calling from (caller's telephone number). This is CA # 1234, one moment please."

6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON				
	LINE NOW)" and then types the way the 911 operator answered the phone.				
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively				
	facilitate communication, as needed.				
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).				
9.	The CA fills out an "Emergency Incident Form" which documents the call.				
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional				
	investigation.				

Back up Procedures

Through their contract with Sprint Accessibility, Nebraska Relay has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.
- The user will be connected to the proper 911 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Nebraska Relay CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures. Supervisors or Operations Administrators are available 24x7 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center

of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency. If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint Accessibility always connects the caller to the police. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance." When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Nebraska Relay offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Nebraska Relay's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated 10-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Nebraska Relay does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has preregistered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an

accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Nebraska Relay does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Nebraska Relay contracts with Sprint Accessibility to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use. Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected. Outbound calls are dialed out in voice mode so both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Nebraska Relay contracts with Sprint Accessibility, who currently has 13 TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint Accessibility samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint Accessibility's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint Accessibility is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being

placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the Nebraska Relay contract with Sprint Accessibility is 90 percent of all calls be placed within 10 seconds measured on a daily basis and 95 percent of all calls measured on a monthly basis. "Speed of answer" identifies the number of seconds required to answer a call. Nebraska Relay's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85 percent of all calls within 10 seconds. Nebraska Relay expects Sprint Accessibility will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays, or technical problems. Utilizing this information, Sprint Accessibility develops a Network forecast for each upcoming scheduling week. Sprint Accessibility also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint Accessibility ensures total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Nebraska Relay considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center. Sprint Accessibility furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint Accessibility's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Through its contract with Sprint Accessibility, Nebraska Relay includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Sprint Accessibility measures its compliance with average speed-of-answer times on a daily basis and reports this information to Nebraska Relay on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Relay Nebraska, through its TRS contract with Sprint Accessibility, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint Accessibility's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each Nebraska Relay toll-free number where it enters the Sprint Accessibility network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Nebraska Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

The following information is applicable for the timeframe through May 31, 2017:

Nebraska Relay TRS and CapTel users have equal access to their chosen IXC through Relay to the same extent access is provided to voice users.

TRS and CapTel users are encouraged to register their preferred Carrier-of-Choice (COC) with Customer Service. Users who have not registered their preferred COC are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls.

Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

Nebraska Relay relies on Sprint Accessibility to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint Accessibility's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint Accessibility provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint Accessibility routes calls to the designated carrier in as efficient a manner as possible. Sprint Accessibility includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone). Calls not requiring operator assistance are routed to the

carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint Accessibility provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint Accessibility encouraged all Carriers to participate in its COC program. When the requested Carrier was not a COC participant, Sprint Accessibility had established a procedure where the Carrier was notified, verbally and in writing, of its obligation to provide access to relay users and encouraged their participation.

Outlined below was the process used by CAs to process COC calls and subsequent instructions to relay callers:

- Sprint Accessibility CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase: "I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."
- The user may choose to have another Carrier handle the call. Sprint Accessibility then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint Accessibility network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint Accessibility had 260 carriers participating in the Sprint Accessibility's TRS COC program. Participation of Carriers in Nebraska is dependent on whether carrier is authorized to provide service in Nebraska and connectivity to the Sprint Accessibility Access Tandem. At the time, Nebraska Relay had 19 carrier of choice companies listed as:

		_		_	
Carrier Name	Out COC	COC Index	Carrier Code	Operator Flag	ETurbo RIB
10-10-811 Vartec	0811	0811	0811	Υ	811
AT&T	0288	0288	0288	Υ	ATT
All Others	0001	0001	0001	N	
Alltel	5253	5253	5253	Υ	AEJ
Broadwing Telecom	0071	0071	0071	Υ	WSN
CenturyLink	0432	0432	0432	Υ	QWD
Charter Communications	6324	6324	6324	Υ	HFB
Cox Communications	6269	6269	6269	N	CJI
EXCEL	0752	0752	0752	Υ	EXL
Global Crossing	0444	0444	0444	Υ	ALN
MCIWorldCom	0222	0222	0222	Υ	MCI
Sprint	0333	0333	0333	Y	SPT
TCG Minnesota Inc.	0292	0292	0292	Y	TPM
TTI National	0555	WT21	0555	Y	WTL
Telecom One, Inc.	0444	AL30	0444	Υ	ALN
Touch America	0244	0244	0244	Y	AUD

TouchTone Communications	0432	LG17	0432	Y	TTC
Verizon LD	5483	5483	5483	Y	GOP
Windstream Communications, Inc.	0893	0893	0893	Y	WCI

The following information is applicable beginning June 1, 2017:

As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering <u>domestic and international calling at no charge</u> with no long distance fees or long distance call billing for all TRS and CTS users through Nebraska Relay service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Nebraska Relay and its end users:

- Correctional Facilities: Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users as is done for traditional phone users (i.e., non-relay callers).
- Payphones: Sprint will <u>provide domestic and international calling at no charge</u> for Nebraska Relay callers using payphones.
- International Locations: Sprint will provide <u>outbound international calling at no charge</u> for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance:** Sprint is offering <u>access to Directory Assistance at no charge</u> for Nebraska Relay Service.
- Pay Per Call Services: Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Nebraska Relay and Sprint Accessibility Customer Service are both available 24x7 for all TRS services. Nebraska Relay, through Sprint Accessibility, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. CapTel Relay Services are also available 24x7.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Nebraska Relay contracts with Sprint Accessibility's Relay centers, which are equipped with an UPS, generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available. Working in parallel with the UPS is Sprint Accessibility's Intelligent Call Router, which

instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Nebraska Relay customers will be unaware of any system fault. In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored.

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities. Please see Sprint Accessibility's Disaster Recovery Plan and the Network Support Plan in Appendix D.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Nebraska Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Nebraska Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Nebraska Relay through Sprint Accessibility, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability. In order to achieve functional equivalence, Nebraska Relay will continue to provide Caller ID service through where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Nebraska Relay receives calling party identifying information including blocking information, from all relay users.

Sprint Accessibility's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint Accessibility passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the State of Nebraska, Sprint Accessibility offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access STS (*787)

Wireless Access – STS (*787)

In early 2012, Sprint Accessibility announced the first wireless short-code solution for STS users. Sprint Accessibility wireless customers are able to dial *STS (*787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS CA. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service. When Nebraska Relay TRS customers travel outside of the state, callers will automatically connected to STS based on their physical location. If they are in a state where Sprint Accessibility is the Relay provider, the caller is connected to the State's STS. If not, callers are automatically transferred to Sprint Accessibility's interstate STS, where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

Sprint Accessibility expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Sprint Accessibility continues to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint Accessibility's speed dialing functionality (also

known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, can be transferred to any new STS provider. When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay. Please see the following graphic for the written Customer Profile form, which encourages STS users to register speed dial entries.

Name	Area Code & Phone Number

STS with Privacy Option

Sprint Accessibility offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information

Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 711 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

Emergency Numbers

In most emergency situations, STS callers dial 911 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Nebraska Relay, through their contract with Sprint Accessibility, provides true Caller ID service where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint Accessibility will receive calling party identifying information including blocking information, from all TRS users.

Customer Control

With Sprint Accessibility's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis. The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen. With Sprint Accessibility's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology

Sprint Accessibility offers True Caller ID for all local and long-distance calls to Carriers who have connectivity with Sprint Accessibility. Sprint Accessibility's network interfaces with all global Carriers and major LECs, CLECs, and ILECs. Sprint Accessibility's Caller ID solution includes receiving the privacy bit information from the inbound Relay caller and other call information elements such as: the Calling Party Number, Charge Number, and Originating Line Information. Sprint Accessibility passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

Selective Call Acceptance

Selective Call Acceptance allows a user to create a list of phone numbers so that the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection

Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

Selective Call Forward

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as: "The person you are calling

does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected." This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voicemail. Realizing not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements outlined below:

Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the Sprint Accessibility Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

Caller's Access Code

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2008, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2008 shall indicate the number of complaints received from the date of OMB approval through May 31, 2012.

Nebraska Relay has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint Accessibility ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

Nebraska Relay works closely with their TRS provider (Sprint Accessibility) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, STS), customer contact information (when given), CA identification numbers, the call handling center and over 45 contact categories including: complaints, inquires, and unsolicited commendations. Sprint Accessibility submits reports detailing this information. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint Accessibility's customer contact database.

Customer Contacts Online Database (CCOD)

To further support the complaint resolution process, Sprint Accessibility has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts. The CCOD will automatically notify the TRS Sprint Accessibility program manager assigned to the State of Nebraska via email of any complaint entry, ensuring they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC. By approximately June 15th of each calendar year, Sprint Accessibility submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. Nebraska Relay reviews the log and then passed the complaint log to the FCC by July 1st of each year.

See Appendix F for copies of the last five years of Nebraska Relay complaints that have been submitted to the FCC.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Nebraska Relay callers may file intrastate complaints and commendations regarding Nebraska Relay services through the following contacts:

Emma Danielson, Senior Customer Relations Manager

PO Box 7443, Springfield, IL 62791

Web www.relayNebraska .com

E-mail: emma.danielson@sprint.com

TTY 800-676-3777

Steve Stovall, Accountant – Communications Department Nebraska Public Service Commission 300 The Atrium 1200 N Street Lincoln, NE 68508 E-mail: Steve.stovall@nebraska.gov

www.nebraskarelay.com

Voice: 402.471.0225 Fax: 402.471.0254

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Examples of such outreach include: the Nebraska Relay website, www.nebraskarelay.com, www.captelnebraska.com. See also Nebraska Relay TRS information in directories (Appendix E), Nebraska Annual Report (Appendix G), and brochures explaining Nebraska Relay (Appendix H).

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

The following information is applicable for the timeframe through May 31, 2017:

Nebraska Relay users are not charged more for services than for those charges paid by standard "voice" telephone users. TRS users, who select Sprint Accessibility as their interstate carrier, will be rated and invoiced by Sprint Accessibility. The caller will only be billed for conversation time. By FCC jurisdiction, Sprint Accessibility has two separate Message Telephone Service rates – one for interstate and one for intrastate. The following table exhibits the discounted rates off Sprint Accessibility's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM all day Saturday & Sunday)	10%	50%

The following information is applicable beginning June 1, 2017:

As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and quicker call set-up. In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering *domestic and international calling at no charge* with no long distance fees or long distance call billing for all TRS and CTS users through Nebraska Relay service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints. Sprint's approach as a global telecommunication provider includes the following benefits for Nebraska Relay and its end users:

- **Correctional Facilities:** Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users as is done for traditional phone users (i.e., non-relay callers).
- Payphones: Sprint will <u>provide domestic and international calling at no charge</u> for Nebraska Relay callers using payphones.
- International Locations: Sprint will provide <u>outbound international calling at no charge</u> for TRS and CTS users. Inbound access is available with customers being charged.
- Directory Assistance: Sprint is offering <u>access to Directory Assistance at no charge</u> for Nebraska Relay Service.
- Pay Per Call Services: Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs - (i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Nebraska Relay intrastate and interstate minutes are reported separately to the state on the Sprint Accessibility invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint Accessibility deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate TRS Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free, and 900. In accordance with FCC rules, states only receive a 51 percent deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint Accessibility uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

ADA Requires TRS Services

In July 1990, the Americans with Disabilities Act (ADA) was passed by our Congress. Title IV of the ADA requires all states provide relay services to deaf and hard of hearing people 24x7.

See Appendix I for legislation documents and the Nebraska Rules and Regulations establishing relay services in Nebraska.

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, the state of Nebraska contracts with Sprint Accessibility who contribute and collect interstate funds through RLSA. It is the State's understanding that Sprint Accessibility complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The State of Nebraska does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Nebraska Relay works in conjunction with the TRS provider, Sprint Accessibility, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments
- Handle all service type complaints
- Resolve complaints with CAs
- Follow up with customers if requested by the customers

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an onsite technician. The state-assigned Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions. If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Nebraska Relay customers also have the option of calling Sprint Accessibility's 24-hour Customer Service department (800-676-3777), the Sprint Accessibility Account Manager or the Nebraska contact to file complaints or commendations. Nebraska Relay has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Nebraska Relay submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Nebraska Relay, through Sprint Accessibility's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint Accessibility will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format. Sprint Accessibility does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint Accessibility will not be sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

HISTORICAL BACKGROUND OF NEBRASKA'S TELECOMMUNICATIONS RELAY SERVICE

During the 1990 Legislative session, legislation was passed authorizing the establishment of Telecommunications Relay Service in Nebraska. Since 1990 this legislation has been amended. The current legislation that includes the original legislation plus amendments are codified in Nebraska statutes 86-301 through 86-315, including Nebraska's current Rules and Regulations are included in Appendix I. Pursuant to the terms of those statutes, the Nebraska Public Service Commission was directed and authorized on behalf of the State of Nebraska to establish such service.

In the spring of 1990 a Request For Proposal was issued by the Nebraska Public Service Commission requesting bids to provide telecommunication relay services under contract for the State of Nebraska. There were five bidders submitting bids to provide service for the State of Nebraska including Lincoln Telephone Company (now "Windstream"), Arapahoe Telephone Company, The Tulsa Association of the Deaf, AT&T, and Hamilton Telephone Company in September of 1990 and service was initiated in accordance with the terms of the contract on January 1, 1991 for a two and one-half year term. The center serviced 5,243 incoming calls with an operator work time of 33,453 minutes during its initial month. Use of the center grew steadily until the 1999-2000 timeframe.

The Nebraska Public Service Commission extended its contract with Hamilton Telephone Company twice as was stipulated in the original contract. Each renewal was for two years for a total of four additional years. On November 22, 1996, the Nebraska PSC

released a Request For Proposal for Telecommunications Relay Services in Nebraska. There were three bidders submitting bids to provide service including Hamilton Telephone Company, Sprint and MCI. The bid was awarded to Hamilton Telephone Company in March of 1997 for a three-year initial term beginning July 1, 1997 with one option to renew for two additional years. Hamilton Telecommunications served 20,208 incoming calls with an operator work time of 133,714 minutes during July of 1997.

On December 11, 2001 the Nebraska Public Service Commission released a third Request For Proposal to solicit bidders to provide Telecommunications Relay Services in Nebraska for the new contract period beginning July 1, 2002. There were three bidders submitting bids to provide service including Hamilton Telephone Company, Sprint and MCI. A fourth bidder solicited to provide service for Video Relay Service only by CSD ("Communications Services for the Deaf"). This contract provided for an initial three-year term with two (2) optional renewal terms of two (2) years each for a total potential contract duration of seven (7) years. On March 19, 2002 the contract was awarded to Hamilton Telephone Company.

On December 5, 2008 the Nebraska Public Service Commission released a fourth Request For Proposal to solicit bidders for Telecommunications Relay Services in Nebraska beginning July 1, 2009. There were two bidders including Hamilton and Sprint. The contract provided for an initial five-year term with two (2) optional renewal terms of two (2) years each for a total contract potential term of nine (9) years. On May 28, 2009 the contract was awarded to Sprint.

In lieu of exercising the first renewal term, the Commission initiated a rebid on the contract. On February 14, 2014 the Nebraska Public Service Commission released a fifth Request For Proposal to solicit bidders for Telecommunications Relay Services in Nebraska beginning July 1, 2014. Hamilton and Sprint provided the bids. The contract provided for a five-year contract term with no renewals. On May 5, 2014 the contract was awarded to Sprint. The July 1, 2009 and 2014 contract included provisions for a performance bond and liquidated damages to ensure compliance with performance standards.

A copy of the award announcing Sprint as Nebraska's TRS provider is referenced in Appendix J with the FCC's 2013 TRS Recertification approving Nebraska Relay as Appendix K. §64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

Effective July 1, 2014 Sprint was selected for a second five-year contract term ending June 30, 2019 for the State of Nebraska. Effective for this time period, Captioned Telephone (CapTel) TRS services was also provided for with Sprint as primary contractor and CTI, the sole provider of CapTel in the United States. CTI is a wholly-owned subsidiary of Ultratec. In addition, two separate CapTel media awareness activities began in September 2017 and will commence again in February 2018. The FCC was notified of these changes per the letter referenced in Appendix L.

Appendix A - FCC TRS Public Notice, July 19, 2017

PUBLIC NOTICE



News Media Information 202 / 418-0500 Internet: https://www.fcc.gov

TTY: 1-888-835-5322

Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

DA 17-697

Released: July 19, 2017

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION

CG Docket No. 03-123

Under Section 225, states wishing to operate their own telecommunications relay service (TRS) programs for the provision of intrastate and interstate TRS must have certification from the Federal Communications Commission (FCC or Commission) to do so. Commission rules provide that states and covered territories may receive TRS certification in five year increments. This Public Notice alerts states and territories that the certifications they now hold will expire on July 25, 2018. Under the Commission's rules, each certified state or territory may file an application for renewal of its certification one year prior to expiration, i.e., beginning July 25, 2017. Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2017, to give the Commission sufficient time to review and rule on the applications prior to expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934, as amended (Act). TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals. Under the Act, the Commission must ensure that the provision of TRS is functionally equivalent to voice telephone services. The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.

All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and speech-to-speech relay (STS) service. States may also offer captioned telephone relay service (CTS). Each state seeking renewal of its certification must submit

¹ 47 U.S.C. § 225(f). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." 47 U.S.C. § 225(a)(3). See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, para. 3 & n.18 (2004) (describing how a traditional TRS call works). Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. See 47 U.S.C. § 225(d)(3).

² 47 CFR § 64.606(c)(1). The Consumer and Governmental Affairs Bureau (CGB or Bureau), under delegated authority, issued its last round of certification grants in July 2013. *Notice of Certification of State Telecommunications Relay Services (TRS) Programs*, Public Notice, 28 FCC Rcd 9987, 9987 (CGB 2013). ³ 47 CFR § 64.606(c)(1).

⁴ Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

⁵ 47 U.S.C. § 225.

⁶ *Id.* § 225(a)(3).

⁷ *Id.* § 225(a)(3).

⁸ See 47 CFR § 64.604.

⁹ See 47 CFR § 64.603.

¹⁰ Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls.

documentation to the Commission that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose. 11 In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints. 12 This certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The Commission's TRS rules further explain that documentation should be submitted in narrative form, and that the Commission shall provide the public with notice of and an opportunity to comment on such applications.¹³

Per the following schedule, the Bureau will release for public comment each application for renewal, after which it will review each application to determine whether the state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules. 14 The state must also establish that the program does not conflict with federal law. 15 In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program. ¹⁶ The Bureau will release public notices of renewal of certification for each state on a rolling basis.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	FCC ACTION	PROCESS
Beginning July 2017	CGB will issue Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2017 - May 2018	CGB will review applications for TRS recertification for compliance with 47 CFR §§ 64.604 and 64.606.	If necessary, the Bureau will send deficiency letters requesting additional information from states to ensure compliance with TRS mandatory minimum standards and other certification requirements.
May 2018 - July 2018	CGB will issue certification renewals on a rolling basis.	

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): http://apps.fcc.gov/ecfs/. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and CG Docket No. 03-123.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to

Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

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⁴⁷ U.S.C. § 225(f); 47 CFR § 64.606(a).

¹² 47 CFR § 64.606(b)(1)(ii).

¹³ *Id.* § 64.606(a).

¹⁴ 47 U.S.C. § 225(f)(2)(A). See 47 CFR § 64.604.

¹⁵ 47 CFR § 64.606(b)(1)(iii).

¹⁶ 47 U.S.C. § 225(f)(2)(B).

submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs/ (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice) or e-mail at Dana.Wilson@fcc.gov.

<u>Appendix B – FCC Matrix, TRS, STS, CapTel Training Outlines</u>
Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards.

FCC Minimum			
Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real- time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has systematic & operational processes intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.

FCC Minimum	Applies to:	Compliant	Conintia Annuacah
Standard	Applies to:	Compliant	Sprint's Approach
64.604(a)(3)(i)			
Types of Calls	TRS, STS, CTS,	Meets	Except to the extent the requirements are
47 C.F.R. §	IP CTS, IP Relay		waived, not permitted, or as the FCC
64.604(a)(3)(ii)			determines that it is not technologically feasible to do so, Sprint services are capable
			of handling any type of call normally provided
			by telecommunications carriers.
Credit Authorization	TRS, STS, CTS	Meets	Sprint understands it is permitted to decline a
47 C.F.R. §	(Waived for IP		call if the user cannot pay or because a credit
64.604(a)(3)(iii) Pay Per Calls	CTS, IP Relay) TRS, STS, CTS	Exceeds	authorization for toll calls is denied. Sprint processes pay per calling for TRS &
47 C.F.R. §	(Waived for IP	Liceeus	CapTel users with blocks available via the
64.604(a)(3)(iv)	CTS, IP Relay)		Customer Profile.
Call Combinations	TRS (Partially	Meets	Sprint's Relay services support all mandatory
47 C.F.R. §	waived for CTS,		FCC call types.
64.604(a)(3)(v)	IP CTS, IP Relay)	N4 t .	O interest to TTV TTV offers to the
Call Release 47 C.F.R. §	TRS (Waived for CTS, IP CTS, IP	Meets	Sprint provides TTY-TTY call set-up which allows the CA to set-up the call & drop off the
64.604(a)(3)(vi)(1)	Relay)		line, if not needed to facilitate conversation.
Speed Dial	TRS, STS, CTS,	Meets	Sprint's TRS/CTS speed dial is available with
47 C.F.R. §	IP Relay (Waived		a Customer Profile. CapTel users can select
64.604(a)(3)(vi)(2)	for IP Relay)		3 speed dial buttons & a phone book for
TI 14/ 0 III	TD0 0T0 0T0		contacts.
Three-Way Calling	TRS, STS, CTS,	Meets	Sprint supports LEC-based three-way calling for its customers.
47 C.F.R. § 64.604(a)(3)(vi)(3)	IP Relay (Waived for IP CTS)		ior its customers.
Interactive Menus &	TRS, STS, CTS,	Exceeds	Sprint electronically captures recordings &
Voicemail	IP CTS, IP Relay		makes interactive recordings & voicemail/
47 C.F.R. §			answering machines available to Relay
64.604(a)(3)(vii)/(viii)			customers. Sprint supports Sprint IP Text Mail
			so Sprint IP users can receive voicemail messages via email, when unable to answer.
Emergency Calls for	TRS, STS (N/A	Meets	Sprint automatically & immediately connects
TTY-based providers	for CTS, IP CTS,	W.OOLO	emergency calls to an appropriate Public
47 C.F.R. §	IP Relay)		Safety Answering Point (PSAP) which is
64.604(a)(4)			capable of dispatching emergency services.
STS Called Numbers	STS (N/A for	Exceeds	Sprint allows STS users to register a
47 C.F.R. § 64.604(a)(5)	TRS, CTS, IP CTS, IP Relay)		Customer Profile which includes Speed Dial & other enhancements.
Privacy Screens	VRS	N/A	This requirement is not applicable to the
47 C.F.R. §			services being offered.
64.604(a) (6)			- C
International Calls Non-	VRS, IP Relay	N/A	This requirement is not applicable to the
reimbursable	(N/A for TRS,		services being offered. Sprint IP has
47 C.F.R. § 64.604(a)(7)	STS CTS, or IP CTS)		procedures in place to prohibit international usage.
ASCII & Baudot	TRS, STS	Exceeds	Sprint's TRS (TTY) platform supports all
47 C.F.R. §	(Waived for CTS,		communication modes generally in use
64.604(b)(1)	IP CTS) (N/A for		including Baudot (domestic & international),
	IP Relay)		ASCII, Turbo Code, & Enhanced Turbo Code
Speed of Answer &	TRS, STS, CTS,	Exceeds	(E-Turbo). Sprint Relay answers at least 85 percent of all
Blockage	IP CTS, IP Relay	EXCEEUS	calls on a daily basis within 10 seconds,
47 C.F.R. §	ii oro, ii rtolay		including abandons. Sprint's systems exceed
64.604(b)(2)			the P.01 standard.
Equal Access to	TRS, STS, CTS	Exceeds	Except to the extent the requirements are
Interexchange Carriers	(Waived for IP		waived, Sprint's TRS & CTS platforms support
(IXCs)	CTS, IP Relay)		the billing & rating of toll calls through other
47 C.F.R. §		L	carriers.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
64.604(b)(3)			
TRS Facilities	TRS, STS, CTS,	Meets	Sprint provides mandated services 24/7 using
47 C.F.R. §	IP CTS, IP Relay		redundant facilities functionally.
64.604(b)(4)			
Technology	TRS, STS, CTS,	Exceeds	Sprint exceeds the minimum mandatory
47 C.F.R. §	IP CTS, IP Relay		services & routinely upgrades its products to
64.604(b)(5) Caller ID	TRS, STS, CTS,	Meets	increase functional equivalency. Sprint provides Caller ID. If not blocked by the
47 C.F.R. §	IP CTS, IP Relay	IVICEIS	customer, the number of the calling party is
64.604(b)(6)	iii oro, ii rtolay		transmitted.
STS 711 Calls	TRS, STS (N/A to	Exceeds	Sprint offers multiple solutions to meet this
47 C.F.R. §	CTS, IP CTS, or		requirement include: Auto 711 Routing for
64.604(b)(7)	IP Relay)		STS users connects callers with a Customer
			Profile directly to STS CAs. CAs answering
			711 for callers without a profile will immediately transfer the caller to a STS CA.
			Sprint offers a wireless short code to STS for
			Sprint wireless users. Sprint's 711 Interactive
			Voice Response (IVR) allows connectivity
			directly to an STS CA using the same level of
			prompts the IVR uses for other forms of TRS.
Consumer Complaint	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint maintains 24/7 Customer Service &
Logs & Procedures 47 C.F.R. §	IP C15, IP Relay		logs all complaints received. Sprint provides the State a summary that meets FCC
64.604(c)(1)			standards.
Contact Persons	TRS, STS, CTS,	Meets	Sprint's point of contact for complaints is
47 C.F.R. §	IP CTS, IP Relay		Customer Service at:
64.604(c)(2)	-		Sprint Relay Customer Service
			PO Box 29230
			Shawnee Mission, KS 66201-9230
			800-676-3777 (English) 800-676-4290 (Spanish)
			877-787-1989 (Speech to Speech)
			877-877-3291 (Fax)
Public Access to	TRS, STS, CTS,	Exceeds	Sprint provides innovative Outreach services
Information	IP CTS, IP Relay		through state programs. The FCC does not
47 C.F.R. §			allow IP Relay providers to include the cost of
64.604(c)(3)			outreach in their yearly costs. Sprint continues to publicize the availability of IP
			services through promo materials, on-line
			marketing, & public service announcements.
			(Sprint does not include the cost of these
			activities in its yearly cost submissions to the
Potos	TDC CTC CTC	Eveneda	FCC).
Rates 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for
64.604(c)(4)	ii OTO, ii Neiay		toll calls, are charged no more than traditional
2 1.00 1(0)(1)			phone users.
Cost Information &	TRS, STS, CTS,	Meets	Sprint contributes to the Interstate TRS Fund
Data Submission	IP CTS, IP Relay		& submits the required cost data to the FCC &
47 C.F.R. §			to the Fund administrator to receive
64.604(c)(5)	TDC CTC CTC	Mosts	reimbursement.
Whistleblower Notice 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its
64.604(c)(5)(M)	ii C13, ii Kelay		employees including instructions for reporting
			noncompliance to the FCC's whistleblower
			hotline.
Complaint Resolution	TRS, STS, CTS,	Meets	Sprint supports timely & effective complaint
47 C.F.R. §	IP CTS, IP Relay		resolution.

FCC Minimum	Applies to:	Compliant	Sprint's Approach
Standard	Applies to.	Compilant	оринг з другоаси
64.604(c)(6) Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to re-establish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			materials include advisories for E911,
			processes for obtaining a number, number
			portability, & updating location information.

Training

Communications Assistant (CA) Training

Sprint knows a well-trained CA has the skills and tools to provide the best customer experience. The education and continued development of all CAs is an investment. Sprint's training has evolved over 26 years in the relay industry, however, Sprint's commitment to quality service has never wavered. Sprint's reputation as a TRS provider within the deaf, hard of hearing, DeafBlind, speech-disabled communities, and the general public comes from our CAs' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. CA trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls. Training does not stop after the initial push. Employees continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and Quality Assurance programs are used as incentives to encourage competition between individual CAs and call centers and encourage continued industry-leading quality.

Sprint listens to customers' feedback and takes proactive steps to implement changes to address suggestions and feedback. Sprint does not develop training and consumer education programs for the TRS in isolation. Sprint Accessibility contracts with members of the deaf, hard of hearing, and DeafBlind communities and individuals with a speech disability to jointly develop and present training for TRS. This is an important Sprint advantage. Sprint provides ongoing training to our CAs on state-specific information including the names of local organizations, cities, and other common terms specific to the State. Sprint welcomes feedback from the State and its end-users.

During initial training, CAs are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's role in the Relay process. Training is provided on various levels of English/Spanish/ASL during initial training and throughout employment. In order to successfully complete initial training, the CA must demonstrate competent skills to translate calls as requested. When training is complete, a CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls.

Sprint incorporates various instructional methods to enhance the trainee's ability to learn:

- Lectures
- Visual graphics
- Flow charts
- Videos
- Role-play scenarios
- Simulated on-line call handling
- Observation of live-call handling

Our policies and standards manual has been developed over the past 26 years. Sprint stresses the importance of all Relay policies and procedures at the interview/selection process and continues through initial and ongoing training and is currently being utilized and available for the Sate to review. An outline of these expectations is provided in the following table. This list is not meant to be a complete source and is subject to change.

	POLICY AND PROCEDURE	E TOPICS
Orientation	Welcome and Introductions	Internet Services
	 Introduction to Each Other 	 Product Distribution
	 Sprint (or Vendor Company) 	 The Sprint Campus (if applicable)
	◆ Sprint Values	Telecommunications Relay Service
	 Sprint Corp Overview 	♦ What is Relay?
	History of Sprint Corporation	Relay Agent Training
	Local Telecommunications	Relay - Connect to Your Future Video
	Wireless	Observation Guidelines
	• • • • • • • • • • • • • • • • • • • •	How a Call Reaches Sprint Relay
Connecting to Relay	The Role of a Relay Agent	Sprint IP user connects to Agent but wants
J ,	Connecting to Relay	Customer Service
	• 711	Sprint IP Two Line VCO
	Dedicated Toll-Free Numbers	• Fed IP Relay
	• Equipment	Fed IP Relay call processing
	• TTY	Fed IP Relay Reporting
	TTY Basics	Fed IP Relay variations
	TTY Etiquette	Sprint/Fed IP Relay International Calling
	 Closing a Conversation 	Sprint/Fed IP Variations
	A 15 3133	Sprint/Fed IP Fast Busy
		0 1 1/2 1/2 0/1 1/00
	Call Set Up	
	Call Closing TTV to Vision Closing a Communities	
	TTY to Voice Closing a Conversation	Sprint/Fed IP Interrupts Value Mail Creating
	Operator Role Closure	Voice Mail Greeting
	Operator Close Protocol Guide:	Cellular & Wireless Phones
	Disallowed Calls	Video Relay Service
	Glossary of Abbreviations & Terms	Devices & Pagers TTV P. H. P. P. H. P.
	 TTY Practice Session 	TTY Public Payphone
	 Auto-Corrected Abbreviations 	Sprint National Relay
	 Standard Abbreviations 	Sprint International
	 Typing Variations 	 Inbound international calling
	 Internet Characters 	 Sprint International Variations
	 Non-Baudot Supported Characters 	 Non-Standard TTY
	 Verbatim - Style 	 Outbound International calling
	 Contraction Spelling 	 Transfer Menu
	 Punctuation 	 Reseller call processing
	 Agent/Operator Role 	◆ CapTel
	◆ SKSK	 Relay-CapTel
	 Background Noises while TTY user is Typing 	◆ CapTel-Relay
	 Typing Monetary Units 	 CapTel Transfers
	→ 711	 Dedicated State CapTel Transfer
	 TTY Garble During Typing 	 Alternate Languages
	 XXX to Correct Typing Error 	 Spanish Language Customer Service
	Other Communication Devices	Relay Caller ID
	 Data Transmission Speed 	→ True Caller ID
	Turbo Code	◆ Per Call Block
	 Turbo Code Interrupt 	◆ Per Line Block
	 Enhanced Turbo Dial Thru - (ETurbo) 	Permanent Call Blocking
	Disable Turbo Code Mode	Caller ID Blocking - True Caller ID
	American Standard Code Information	Connecting Variations
	Interchange (ASCII)	Misdialed Relay Phrase
	ASCII Interrupts	 Dialed 711 Instead of 911
	- Acon interrupte	- Dialog FFF Indicad of JFF

	POLICY AND PROCEDURE	TOPICS
	Sprint IP - Internet Relay	→ 711 Spanish
	Sprint IP call processing	Request for Relay Numbers
	 Internet Relay variations 	Cellular/Wireless problem reaching 711
	• 'GA' is optional	• 611/811 (LEC Service Access)
	 Sprint IP Standard Svc Explanation 	→ 700
	Text Flow	 900 Numbers & Call Processing
	 Interruptions without garble 	 Correctional Facility/Prison Calls
	 Conversational flow 	 Use of Relay through Correctional Facilities:
	 ASL Emoticons – Text Message Abbreviations 	Correctional Facility Call Processing, Relay Abuse
	◆ IP Acronyms	Spanish & French Language Service
	Sprint IP Variations	International calling restrictions
	Sprint if variations	
		Info Digit list
		911 Emergency Calls
Overview of System	 System Overview 	Dial Window
& Equipment	 Login/Logout 	Scratch Pad
	 Agent Profile 	Transfer Panel
	Clicking the Mouse	Headset Panel
	 Dragging/Dropping 	Status Bar
		Record Feature
	Copy/Paste	
	Drop Down Boxes	 Function Keys
	◆ Lists	♦ Block
	 Radio Button 	Ctrl-Switch
	Scroll Bars	Switch
	◆ Sliders	The Keyboard
	◆ Tables	◆ Alpha Keys
		0 11 11 11 14
	Screen Displays	• Numeric Keys
	 Call Handling Screen 	 Cursor Movement Keys
	Title Bar	 Arrow Keys
	 Banner 	Backspace
	 Conversation Area 	Error Correction Function
	Disconnect Message Status	Single Word Edit Function
	Color Scheme	Word Substitution Feature
	Agent Text Transmission	
	Cancel Key	Ctrl-Function Keys
	 Information Bar 	 Glossary of Telephony Terms
	 Profile 	 Background Noises
	→ Help	 Voice Tones/Descriptive Words
	◆ Call Type	Standard Abbreviations
Phone Image	Professional Phone Image	◆ Voice Person Speaking in Third Person
(Tone of Voice)		
(10110 01 10106)	How phone image is created Drawids warms % friendly greating.	Pacing the Voice Customer
	Provide warm & friendly greeting	Brief pacing phrases
	 Conversational Tone 	 Repeating information
	 Voice Inflection 	 Voice Customer does not say "GA"
	 Audibility & breath control 	 Handling Interruptions
	◆ Pitch	♦ Voice Tone
	• Quality	How Phone Image is Created
	Operator Role	 Why Conversational Tone?
	• Relay Role	Transparency, Caller Control & Confidentiality
	 Relay Skills 	◆ Rudeness
	 Conversational Flow 	 Create an Exceptional Customer Experience
	 Staying focused 	Announce
	 Listening skills 	◆ Closing
	Customer service skill	◆ Suggested Redirect Phrases
	Coping skills	Transparency & Caller Control
		Transparency & Galler Control
	Phrases	
	 Background Noises 	
	 Voice Tones/Descriptive Words 	

	POLICY AND PROCEDUR	RE TOPICS
TTY-Voice &	TTY to Voice Introduction	◆ TTY-Voice Busy Signals
Voice-TTY	Connecting to outbound customer	Regional 800
	Announcement	♦ Voice-TTY
		 Voice-TTY Introduction
	Deaf or Hard-of-Hearing Explanation	Connecting to the outbound customer
	International Announcement	Voice Greeting
	TTY-Voice Procedures	 Voice call progress
	 TTY-Voice Specific Person Request 	 Announcement
	 Variations Specific Person Request 	 Voice-TTY call (Hearing Person Answer)
	 TTY-Voice Answered TTY 	 Explanation of service
	 Voice Person Not Available 	 Voice-TTY Procedures
	TTY-TTY Call Release	 Voice-TTY Specific Person Request
	 TTY-Voice Answer TTY (TTY-TTY) 	 Voice-TTY Answered Voice
	 TTY-TTY Specific Person Request 	 Voice-TTY No Answer
	TTY-Voice No Answer	 Voice-TTY Busy Signal
	 Types of Busy Signals 	, ,
	• Redialing	
Branding	Inbound Answer Type Branding	Branding procedures
Ü	 Database Branding 	3, 1111
Recordings,	Introduction	♦ AMR
Answering	Recording Feature	TTY-Voice Pager/Beeper (known)
Machines, Pagers, &	 Information Line Recording (TTY/ Voice) 	TTY-Voice Pager/Beeper (unknown)
Answering Machine	Touch Tone Dialing	 Voice-TTY Pager
Retrieval (AMR)	 Using Touch Tones (TTY/Voice) 	 Voice-TTY Answering Machine
()	Audio text interaction	
	Variations for Recordings	Voice Mail System
	Record Feature Tips	Privacy Manager/Call Intercept
	TTY-Voice Recordings	Automatic Redial System Recordings
	 TTY-Voice Recording Information 	 Switchboards
	 TTY-Voice Answering Machine 	 Redialing Voicemail through Switchboard
	 Variations: Answering Machine/ 	 TTY-Voice Asking for Specific Person
	Recording/Pagers	 Live person On Answering Machine Redial
	 Voice Mail Retrieval 	
VCO	 VCO Introduction 	 Reverse 2LVCO Intro
(Voice Carry-Over)	 VCO Announcement 	 Reverse 2LVCO Procedure
	 VCO Service Explanation 	 VCO Variations
	 VCO Equipment 	 VCO comes in Voice Line
	Non-Branded VCO	2LVCO Conference Calls
	Branded VCO	 VCO Requests Relay to give Relay #
	VCO No Answer	 VCO Privacy while leaving message
	VCO Busy	VCO Voice Mail Retrieval
	VCO Privacy	2LVCO Voice Mail Retrieval
	 VCO Answering Machine 	 VCO Types and Voices
	Voice-VCO Answered TTY	
	Voice-VCO Answered VCO Ture Line VCO (21 VCO) Intro Ture Line VCO (21 VCO) Intro Total Li	VCO Requests CA gives name in notes NCO Recordure
Dilling	Two-Line VCO (2LVCO) Intro T	Labourd Asia was a #
Billing	Introduction	• Inbound tells wrong #
	Local call description	Agent dials wrong #
	Paid by Inbound	→ Marine
	Toll Free Calls	 Roaming Feature
	 Calls that Cannot Be Processed 	 Restricted Roaming
	Specific Person Request	 Unrestricted Roaming
HCO	HCO Intro	 Voice-HCO Answered
(Hearing Carry-Over)	 HCO Announcement 	 Voice-HCO Answered TTY (1) (2)
	 HCO Service Explanation 	 Voice-HCO recorded message answers
	 People with speech disabilities "S" 	2LHCO Intro
	Non-Branded HCO	Two-Line HCO Procedure

	POLICY AND PROCEDURE	TOPICS
	Branded HCO	Reverse Two-Line HCO
	 HCO with Privacy 	HCO Variations
	HCO No Answer	 Inbound requests VCO/HCO
	HCO Busy	HCO User Requests to Speak
	HCO-Voice Answering Machine	· The edge the queste to epocal
Customer Database	Enhanced Customer Database Profile	Customer Profile Introduction
Castomor Database	Household Profile	Use/Edit/New/Delete Customer Profile
	Edit Household Profile	
		Verify Customer Password for Agent Verify Customer Password
	Navigating Customer Database Navigating Customer Database	 Verify Customer Password – CSR Only Customer Profile Panels
	Household Profile Panels Fragueath Pieled Numbers	
	Frequently Dialed Numbers	Personal Information
	Preferences	• Notes
	Restrictions	 Frequently Dialed #s
	→ Blocked	Emergency #s
	 Emergency Numbers 	♦ STS
	♦ STS	 STS Messages
	 STS Messages 	 Database Profile Macros
Directory Assistance	DA Intro	Call Processing Calling from International
(DA)	 Interstate DA 	Number
	 Intrastate DA 	 Sprint International Variations
	 Automated DA 	 Non-Standard TTY
	DA City & State Given; Area Code Unknown	Answered Foreign Language
	DA Variations	Transfer Menu
	International Transfer Menu	900 # Call Processing
		• 211/311/511 Requests
Device-to-Device	· committee of the comm	
Calls	Device to Device Intro	VCO-HCO & HCO-VCO VOO HOO
Calls	Function Keys & Banner Messages	♦ HCO-HCO
	VCO-TTY & TTY-VCO	Device to Device Variations
	♦ VCO-VCO	 Alternate Call Type reaches recording
	◆ TTY-HCO & HCO-TTY	
Call Processing	 CA information 	 Request for Length of Call
Variations	 Area Code Only In From Number 	 T-V Call & V Requests Supervisor Call Backs for
	 Conversational Flow 	TTYs
	 Static or Poor Connection 	 Multiple Calls
	 Profanity towards Agent 	 Sensitive Topics
	Redialing	 Suicide
	Young Children	◆ Abuse
	 Inbound Does Not Connect 	Illegal Calls
	Inbound ASCII	 Answering Machines
	Tone Judgments	Hangs Up Before Message Left
	 Repeating Information 	 Do Not Type Recorded Messages
	Restricted Calls	
	Two calling from numbers To Service Office The S	Change Answering Machine Message VCO Requests Leave Message 1st out diel
	LEC Service Office	VCO Requests Leave Message 1st out dial
	◆ 611/811	Leaving a Message V-TTY Ans V Patricia Message V-TTY V Associate
	Double Letters	Retrieving Messages from TTY V Answering
	Call Waiting Feature	Machine
	 Conference Calls 	TTY Screener
	 Party Line Calls 	 Request to Leave TTY Message on Answering
	Three-Way Calling	Machine
	 Hard of hearing customer Answers TTY Line 	 Recordings
	Spanish Calls to Spanish Speaking Agents	Regional 800
	Request for Alternate Language	 TTY Requests "Dial That Number"
	Caller Types in Alternate Language	Recording with Relay Option
	 Voice Customer Hangs Up During Call 	Alternate Call Recording Reached
	 Voice customer hangs op buring call Variable Time Stamp 	• English/Spanish
	Variable Time Stamp Customer Misdialed Phrase	• Pound
	Customer iviisuraleu mirase	TouridTouch Tone Phone
		T TOUGHT ONE THOUG

	POLICY AND PROCEDUR	E TOPICS
	TTY Customer Hangs Up During Call	Advertisements
	Non Standard TTY Capability	 Do Not Type Recordings
		Get Live Person/Rep
	TTY User Does Not Type GA	Conversation Being Recorded
	 Dispatch Calls – Pizza, Taxi, etc. 	 Dial Number from Recorded Announcement
	 Customer Referral Guidelines 	◆ VCO
	 V-T Calls answered by Fax 	 Conference Calls
	 Customer Requests 	 Leave Relay Number
	Holding for Inbound prior to out dial	Voice Mail Retrieval
		VCO Types & Voices
		• •
	Request for M/F Agent	◆ Prompting
	 Request Specific Agent 	 Data Transmission Box
	 Agent Knows Customer 	 Prompting VCO on Hold
	 Request for Relay Number 	 Requests VCO/HCO
	 Customer Requests to Call Relay Service 	→ HCO
	Request for Calling From Number	Requests VCO/HCO
	Request Telephone Number Referral	• • • • • • • • • • • • • • • • • • • •
	Request for Date/Time	Bridge Left Open
	 User Requests Agent to Modify Call 	
Call Take Over	◆ FCC Rule	◆ VCO
Procedures	 Protocol & process flow 	♦ VCO-VCO
	 TTY-Voice and Voice-TTY 	→ HCO
	◆ ASCII	 VCO-TTY & TTY-VCO
Customer Service	• Functions	Procedures
Oddiomor Oct vice	 Language Services 	1 locedules
Transparency	Non-Emergency Calls	Network Failure
Transparency		Network Failule
Construction Call		TTV FTTV O-II D-I
Emergency Call	Emergency Calls Intro	TTY-Emergency TTY Call Release
Procedures	 Emergency Services 	 Internet-Emergency
	 FCC Requirements 	 Instant Messenger (IM) Emergency
	 Emergency Call Processing 	 Emergency Call Processing Variations
	 Emergency Reporting 	Emergency Form
	 TTY-Emergency 	 Voice-Emergency
Federal Relay	FedRelay Intro	FedRelay Confidentiality Policy
Service		
Service	FedRelay Announcement	
	 FedRelay Service Explanation 	 FedRelay Customer Contacts
	 FedRelay Procedures 	 FedRelay Reporting
	 FedRelay call types 	
STS (Speech-to-	STS Introduction & History	 Ways to Reduce/Streamline Notes
Speech)	STS Description	 Standard Abbreviations (STS)
. ,	Disabilities	STS-Voice
	Characteristics of STS users	Voice-STS
	Stereotypes	STS VCO-Voice
	 Clarifying Phrases 	 Voice-STS VCO (TTY answer)
	 Phrases to Avoid 	 Voice-STS VCO (VCO answer)
	 STS Phone Image 	STS VCO 2 Line VCO
	STS Agent Tools	• TTY-STS
	Consistency	• STS-TTY
	Patience	
	Ask Yes/No Questions	♦ STS-HCO
	 No Personal Conversation 	STS Hold Message
	Phrases	STS Call Takeover
	 STS Alphabet 	 Confidentiality & Transparency
	 Transparency/Call Control/ Confidentiality 	 Personal Conversations requests
		STS Variations
Healthy Detachment	Healthy Detachment Intro	Perception
	Objectives	Ways to Reduce Stress
	→ ODJEGUIVES	vraya to Neudoe Otteaa

	POLICY AND PROCEDURE	TOPICS
	Survival Skills	Hospitality
	Relay Traps	◆ Phrases
Healthy Relay	◆ Introduction	Setting up Workstation
, ,	 Objectives 	GUAM - Get Up and Move
	• Ergonomics	 Ergonomic Relief
	Stretching Exercises	Slowing the Customer Down
	Agent Reinforcement	 Overtime
	Ergonomic Review	 Relaxation
Adult Learner	Understanding the Needs of the Adult Learner	→ Modeling
	The Learning Continuum	Checking For Understanding
	 Use of Different Modalities 	Guided Practice
	 Edgar Dale's Cone of Experience 	 Independent Practice
	Elements of Lesson Design	◆ Summary
	→ Focus	Evaluation
	Objective & Purpose	How to Give Effective Instruction
	• Input	Questioning Guidelines
	Trust in Management	Feedback - Training & Coaching Technique
Assessing	The Assessment Process in Training	Acceptable Time Frame
Performance	Assessment - What is involved?	Acceptable Is Relative
	Practice Time	Ways to "Coach"
	Spelling Test	• Feedback
	Written tests	Maintain Self-esteem & Motivate
	Side by side evaluations	Pass/Fail Guidelines
	Typing	Introduce Assessment Form
	1 yping	Form Set-Up
Introduction to	Introduction to Diversified Culture	
Diversified Culture		1
Diversified Oditure		
	Who Uses Relay Understanding Our Customer	Myths About Deafness Two Views of Deafness
	Understanding Our Customer Special Communication Needs	
	Special Communication Needs Dethological via Cultural View of Deafaces	
	Pathological vs. Cultural View of Deafness	Characteristics of Deafness The Deaf Community
Doof Horitage	A History in France	The Deaf Community This are Callandate
Deaf Heritage	History in Europe	Edward Miner Gallaudet Oral/Countries of Balanta
	History in North America	Oral/Combined Debate Transfer of Part History
TI D (0 ')	Alexander Graham Bell	Timeline of Deaf History
The Deaf Community	Introduction to the Deaf Community	American Athletic Association of the Deaf
	National Association of the Deaf	National Theatre of the Deaf
	Contributions to Society	Assistive Devices
	Mainstreamed Schools	Gaining Acceptance in the Deaf Community
	Sign Language Interpreters	 Changes in the Deaf Community
	Different Communication Systems	Working with a Sign Language Interpreter
	Exposure to English	 Interpreting Standards
	DEAF President Now	Equal Access
	 Attitude Changes toward the Deaf Community 	Cochlear Implant Controversy
American Sign	What is ASL?	 Rules of ASL
Language (ASL) Pt.	 History of ASL 	 Five Parameters of ASL
1	ASL Recognized as Language	English vs. ASL Idioms
American Sign	 Evolution of ASL 	 Translate ASL to English and Vice Versa
Language (ASL) Pt. 2	ASL Syntax	
TTYPhony & TTY	First Teletypewriter	TTY Courtesy
Courtesy	Evolution & History of the TTY	1
Courtesy		Development of Relay Service Market
Doof Customers	Telecom Laws of Accessibility Statistics form NIDOD	Delevine for Deef Contract
Deaf Customers	Statistics from NIDCD	Relaying for Deaf Customers
Hard of hearing &	Characteristics of Deaf Customers Assisting Parison for P	Establishment of Hearing Loss Association of America
Late-Deafened	Assistive Devices for Deaf Customers	America
Customers	 Establishment of Assoc. of Late-Deafened 	 Deaf Seniors

	POLICY AND PROCEDURE	TOPICS
	Adults	Military Veterans
		 Relaying for Late-Deafened Customers
DeafBlind Customers	 What Does DeafBlind Mean Assistive Devices for the DeafBlind Relaying for the DeafBlind 	 DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine
Relaying for Speech/ Cognitively Disabled Customers	 Speech-Challenged Customers Assistive Devices Physically &/or Cognitively Challenged Customers 	Traumatic Brain Injury Stroke Communication Related Effects
Relaying for Hearing Customers	Statistics	
Ethics & Confidentiality	 Interpreting Standards ADA & FCC regulations for the Provision of TRS Regulations pertaining to call content 	 TRS Rules – Operator Standards Relay Center Agreement Regarding Confidential Customer Info

On-Going Quality Focus Skill Training

Continuous skill training is the cornerstone of Sprint's training program. Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. Sprint develops skills training programs and on-going training labs to ensure skills are maintained and remain consistent with basic relay training. Refresher training is provided on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. Our on-going skill training program includes:

- Quality Focus Skill training monthly
- Diversified Culture Awareness training monthly
- Customer Service Initiative monthly
- Check for Understanding monthly
- Grammar and Spelling Rules bi-annual

Quality Focus Skill Training topics from 2016/2017:

Quality 1 ocus okiii 11ainiing topics noni 2010/2011.		
Dialing the correct number within 5 seconds		
Typing the Voice/TTY greeting verbatim, Announcement protocol including a prompt state-specific		
announcement/greeting used/ ID number given		
Call processed according to procedures, specifically following Customer Note instructions		
State-specific announcements/greeting/ID given, Call closing protocol, Appropriate closing and macro		
for call type		
Specific person request announcements, Progress of call/Customer Informed		
Call transfer procedure, Adapting to call procedures changes as directed by the customer.		
Typing greeting verbatim, Typing message verbatim, Voicing the complete message		
Maintaining transparency maintained, Typing messages verbatim		
Dialing efficiency and protocol		
Typing/reading voice/device answer greetings verbatim, Call closing procedure, Relay mode closing		
protocol, Operator mode closing protocol		
Changing call procedures as directed by customer, Appropriate macros use., Non-branded VCO call		
type setup		
Call type standard procedure, Modifying call procedure as directed by the customer, Transferring (711		
customer request)		
Dialing the correct number within 5 seconds		
Determining familiarity with relay services, Call type appropriate service explanations, Appropriate		
macro use (EXPLAINING RELAY)?		
Following customer note and customer typed Instructions		

Apr 2017	Announcement protocol including a prompt state-specific announcement/greeting used/ID number		
	given, Call closing protocol, Appropriate closing and macro for call type.		
May 2017	Specific person announcement procedure		
Jun 2017	Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711 transfer		
	compliance		

Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Diversified Culture Awareness Training topics from 2016/2017:

Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the		
	relay service? Why is it important for us to understand our customers? Why is it important for us to		
	recognize their special communication needs?		
Feb 2016	The History of Deafness		
Mar 2016	Ways to Detach		
Apr 2016	Deaf Nation Expo is		
May 2016	American Sign Language is, CODA means		
June 2016	All About CapTel, How it works		
July 2016	Baseball Signs originated from Sign Language		
Aug 2016	Accessibility for All, Sprint corporate responsibility		
Sept 2016	Diversity-Equality-Inclusion		
Oct 2016	Disability is Diversity, Stretches to do at your desk		
Nov 2016	Disability Awareness		
Dec 2016	Disability Advocacy		
Jan 2017	View of a person's abilities		
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist		
Mar 2017	Disability Awareness		
Apr 2017	Parkinson's Awareness Month		
May 2017	Limb Loss Awareness Month		

The following is an example of the monthly Quality Focus Check for Understanding from March 2017.

Check For Understanding Quality Focus March 2017

Please return to your supervisor by March 7, 2017.

- Name Supervisor What is the first thing an agent should look at when a call comes to their station?
- 2) If a customer requests that the agent verifies the Calling To number before dialing out the agent
- should type or say something like,

 The IP Call number to dial is entered by the inbound, therefore you DO NOT need to verify the
 Calling To number before outdialing on an IP call, even if it's in the Customer Notes to do so. TRUE FALSE
- 5) If the customer has TYPE RECORDINGS as a preference or instruction the agent should not _. This instruction indicates that the customers the agent to type the recordina
- If a device user requests that you do not announce relay, the agent should:
 - Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
 - b) Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
 - c) Inform the caller they are required to announce the call.
- 7) What is the purpose of the customer notes?
 - a) To assist the agent in processing the call how the customer prefers.
 - b) To annoy the operator.
 - To ensure the customer does not have to repeat their instructions before every call.
- d) Both A and C. When using <ALT .>, agents should send it:
- a) Only once and then pause a few moments before sending it again.
- b) Twice and then pause a few moments before sending it again
- c) As many times as they want since they are in the buffer and can be canceled when the phone is answered.

TTY/ASL Refresher	Provide examples of how to relay the statements
" TIME WHAT Q	
" GO PARTY YOU Q	

Customer Service Initiative (CSI) program: A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. 2016/2017 CSI topics are provided in the following table.

Use of "Deaf/hard of hearing" and/or "internet service" in announcements.		
Outdial time, Inappropriate use, Veterans and hearing loss		
Sprint IP go ahead, Keeping the caller informed, Facilitate communication		
Procedure for recordings, Chemotherapy and hearing loss		
Caller control, Keeping the caller informed, Announcements, FCC verbatim requirement, State requirement call customization request		
Solicitation for agent process improvement suggestions, Caller control		
Call closure, Equal communication access		
Call processing reference information, Sprint Relay customer care, Speed of service recognition		
Brief service explanations, Call handling tips from agents		
Customer commendations, States and capitals review		
System enhancement prioritization		
Customer instructions, FCC call take over rule, Transparency		
Transparency, Caller control		
Customer notes, Operator/Relay mode, Call handling tips from agents		
Stress management		

The following is an example of our bi-annual Grammar and Spelling Rules from 2016/2017.



Homonyms (also called homophones) are words that sound like one another but have different meanings. Some homonyms are spelled the same, like bark (the sound a dog makes) and bark (the outer layer of a tree trunk).

I and Me Usage

	when to rise	Example Sentence	HOW to test:
I	when you're reterring to the subject of a sentence or clause	Julia (subject) and / (subject) always go together.	To know if you should use "I" or "me" take the other pronoun out of the sentence and see if it still makes
Me	when you're reterring to the object of a sentence or clause	will you (subject) be coming with me (object) to the store?	sense.

Examples:

ī

Harry and I/ me went to the store.
Test: Me went to the store (Incorrect!)
Test: / went to the store. (Correct!)

Jake Invited Brian and I/ me over for dinner.
Test: Jake invited / over for dinner. (incorrect!)
Test: Jake invited me over for dinner. (Correct!)

Me

Will you take my brother and lime to the movies?
Test: Will you take / to the movies? (Incorrect!)
Test: Will you take me to the movies? (Correct!)

Sam, Jennifer, and Vime went to the beach.
 Test: //e went to the beach. (Incorrect!)
 Test: / went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	wnen to use	How to rest	
ı nere	Naming a place, a thing, or the existence of something	it you can replace "there" with "nere" you have it right!	
Ineir	Snowing possession	if you can substitute their with four you have it right:	
i ney re	Combining the words "they" and "are"	"I ney" is a pronoun and "are" is the vero. If you can substitute "We are" you have it right!	

Have and Has Usage

	Singular	Plural	Hint
7" Person	I nave	we nave	"Have" and "nas" are both present tense conjugations of the verb "to have", and we use
2~ ⊬erson	You nave	You nave	"have" or "has" depending on the subject. If the subject is 3" person singular, then you use
3~ Her30⊓	He/Sne/It nas	iney nave	"has". All other subject take on "have".

It's and Its Usage

	s and its osage		
	wnen to use	How to rest	How to rest
lt's	when you're about to describe something	жеріасе with "it is"	ir you can replace hirs: with hit is: you have it right! Otherwise do not use punctuation.
lts	when you want to indicate ownership of something	Replace with another possessive adjective ("her," "his," "their") or "the"	and particularies

Ten Common Spelling Rules			
Rule	Examples	Memorize	
1. 'ie' or 'ei' Write i before e, except after c Write ie after c for words with a sh sound. Write ei when the vowels sounds like an a as in 'weigh'	Bachieve, believe, friend receive, receipt, perceive Bancient, efficient, sufficient, conscience Oneighbor, vein, reign, rein, deign	Exceptions: Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird	
2. "s" or "es" Add es if a word ends in ch, sh, ss, x or z Add es for most words ending in o	O arch > arches, clash > clashes, class > classes, box > boxes, quiz > quizzes O tomato > tomatoes, hero > heroes, go > goes, do > does, echo > echoes	Exceptions: Words like altos, duos, pianos, radios, solos sopranos, studios, videos, typos	
3. 'y' to 'i' or not ● For words ending in y preceded by a vowel, retain the y when adding s or a suffix. ● For words ending in y, retain the y when adding ing. ● For words ending in y, preceded by a consonent, change the y to i before any other suffix.	O convey > conveys, employ > employer O try > brying, justify > justifying, certify > certifying, study > studying O try > bried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	Exceptions: Words like dryness, shyness	
4. drop the final 'e' DROP the e when the suffix starts with a vowel. DROP the e when the word ends in dge. DROP the final e when adding -ing	Osave > savable, use > usable Ojudge > judgment Osave > saving, manage > managing, trace > bracing, emerge > emerging	Exceptions: DO NOT DROP the elif the word ends in ce or ge (e.g. manage > manageable, trace > traceable)	
5. "t" or "t" when adding -ing, -ed and some suffixes to verbs ● DOUBLE the t for verbs of one syllable with a single yowel, or a short yowel sound. ● DOUBLE the t for verbs of more than one syllable when the stress is on the last syllable.	Orat > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted Oabet > abotting, abotting allot > allotting, allotted commit > committing, committed emit > emitting, amitted forget > forgetting, forgotten (but forgetful)	Exceptions: DO NOT DOUBLE the f for verbs of one syllable with a double vowel or a long vowel sound (e.g. treat > treating, treated; greet > greeting, greeted)	
6. 'r' or 'rr' when adding -ing, -ed and some suffixes to verbs DOUBLE the r for verbs of one syllable when the final r is preceded by a single vowel. DOUBLE the r for words of more than one syllable when the stress does not fall on the first syllable.	Ostar > starring, starred, starry tar > tarring, tarred war > warring, warred (but warfare) scar > scarring, scarred stir > stirring, stirred Oconcur > concurring, concurred, concurrence cocur > occurring, occurred, but deference) defer > deferring, deferred, (but deference) deter > deterring, deterring, deterrent inter > inferring, inferred, (but inference) prefer > preferred, preferring, (but preference) refer > referred, preferring, referred	Exceptions: DO NOT DOUBLE the r for verbs of one syllable when the final r is preceded by a double vowel (e.g. fear -> fearing, feared) DO NOT DOUBLE the r for words of more than one syllable, when the stress falls on the first syllable (e.g. prosper > prospered, prospering)	
 'f, or 'll' when adding -ing, -ed and some suffixes to verbs DOUBLE the / when it is preceded by a single vowel. 	cancel > cancelling, cancelled, cancellation fulfil > fulfilling, fulfilled, fulfillment level > levelling, levelled brovel > travelling, travelled, braveller /braveler	Exceptions: DO NOT DOUBLE the / when it is preceded by a double vowel (e.g. conceal > concealing, concealed)	

Staff Training

Our entire Accessibility team exists for our customers. Training on all aspects of ASL, deaf culture, the needs of hearing, speech and dual sensory impaired users, ethics and confidentiality is vital to our success. These topics and others help us to be able to meet and exceed customer expectations and requirements.

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is

a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

Sprint staff members are also required set annual corporate training and development goals. Individual performance is measured and tied to compensation. Ongoing Staff Development is also key to overall staff performance. Sprint's Accessibility Customer Solutions (ACS) group hosts an interactive meeting called the Sprint Accessibility Café. This monthly meeting is an opportunity for the Accessibility Team to share market and industry product updates. Presenters from outside the group and subject matter experts from the Relay industry also provide updates.

Appendix C: TRS Pledge of Confidentiality

Sprint's reputation as an ethical company is the key to enabling us to be the preferred communications company – a place that delivers the best experiences for employees, end users, and state customers. Throughout initial and on-going training, communications assistants (CAs) receive information and guidelines on professional conduct with an emphasis on ethics and confidentiality, based on Sprint's "Relay Center Code of Ethical Conduct" and "Principles of Business Conduct." CAs are presented with possible situations involving ethical issues and are taught how to apply the conduct guidelines to each situation.

All Relay center personnel are required to sign and abide by a pledge of confidentiality that promises not to disclose the identity of any caller or any information learned during the course of relaying calls. In conjunction with signing Sprint's confidentiality agreement, as a part of training, CAs role-play various scenarios which teach the correct way to ask for assistance from a supervisor without divulging call-specifics. Examples of confidentiality breaches are reviewed and discussed with the CAs.

Sprint strictly enforces confidentiality policies in the center, which includes the following:

- Prospective employees are screened during the interview process on issues regarding ethics and confidentiality.
- On day one of training, employees must sign a Pledge of Confidentiality Agreement Form.
- During initial training, employees are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.
- After graduation from initial training, employees are reviewed yearly on the Pledge of Confidentiality and are required to re-sign promises not to disclose the identity of any caller or any information learned during the course of relaying calls.
- Breach of confidentiality may result in termination of employment.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in work areas.

Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an investigation may be subject to corrective action up to and including termination. This

information is contained within Sprint's Code of Conduct all employees are required to complete annually.

There is a TRS whistleblower protection notification posted at Sprint TRS call centers in accordance with FCC rules. CSD also obtains a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

Training on Ethics

Sprint Relay employees receive training on the appropriate protocol to protect relay users' privacy and how to prevent the unintentional disclosure of relay communications. When trainees observe calls and ask questions once back in the training room, trainers lead a discussion on the appropriate method to seek clarifications without divulging confidential information. CAs may also role-play various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Examples of ethical issues and challenging circumstances are reviewed and discussed with CAs. During initial training, CAs are required to pass a series of written and skills-demonstration tests, which include their understanding of the Relay Center Code of Ethics and how to apply the Code to hypothetical situations. Trainees who do not pass these tests are not utilized as CAs.

Sprint's high-performance culture focuses on accountability, first and foremost, along with open communication and innovation. Within these traits, integrity and ethics are critical success factors. Amidst unprecedented change and technological advancement, acting with integrity is not just the right thing to do; it is the unwavering foundation for Sprint.

Confidentiality

Sprint believes measures to ensure confidentiality are crucial to the success of TRS operations and has implemented procedural and environmental measures to safeguard customer and call information. Sprint has policies in place to protect users' confidentiality. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs are taught using various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our CAs' participation in an interactive training program focusing on scenarios that they are likely to encounter when relaying calls.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without elaboration. Maintain a professional and friendly image with	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
customers.	
It is appropriate to discuss with a member of management technical or procedural components of a call. For example, to say you had problems placing a calling card call from a pay phone.	It is not appropriate to discuss call content or conversations with others, ever.
It is appropriate to call for a Supervisor to look at your	It is not appropriate to request assistance from the agent sitting next
screen for assistance with the call.	to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. The relay center Code of Ethics requires the following:

- Keep all TRS call-related information strictly confidential.
- Keep no records of customer information or content of any TRS call.
- Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
- Refrain from adding or injecting into the content of the conversation or the spirit of the speaker.
- Assure maximum customer control.
- Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CA's terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment. Sprint takes the following steps to ensure Customer Profile information remains secure:

- Sprint does not modify a customer's record based on experience.
- All Customer Profile database entries contain time and date stamps and note the identification number of the CA who processed the request.
- Relay users register a username and password/PIN. Sprint also asks customers to register a security question and answer only known to them in case the username and password is lost or forgotten.
- Sprint's Customer Profile information is encrypted and protected from outside access by firewalls.

CTI Confidentiality Form

Consumers need to be confident that their personal and professional calls are kept in the strictest confidence. It is crucial that all employees understand and abide by this Confidentiality Policy.

All information obtained during a CapTel call is to be kept strictly confidential. The only person(s) to whom information obtained during a call may be divulged is a member of the administrative team (i.e. supervisors, trainers, HR representatives, the Floor Operations Coordinator, or the Call Center Director). Only specific, pertinent information relating to Training, Call difficulty, Technical difficulties, Emergencies or Customer service issues may be disclosed to the appropriate personnel, and this must be done in private.

Under no circumstance are identifiers to be used while discussing a call (terminology that would identify personal information about a caller including, but not limited to, gender, name, address, and business information). The standard, objective way off referring to callers is to identify the person using the captioned telephone as the "client," while the other party or parties are referred to as the "doc(s)." Furthermore, any person not employed by CapTel, Inc. or its parent company shall not be allowed on or near the call floor.

Nor shall information regarding CapTel clients be discussed or posted in any public forum. Employees agree to abide by the following:

- I shall only discuss the content of a CapTel call (production, training, timing, or otherwise) with a member of the administrative team under the guidelines provided above. I will not discuss the content of a CapTel call with other persons (CAs, friends, family members, etc.).
- I shall disclose only appropriate information regarding a training/timing call to a member of the administrative team according to the guidelines documented above.
- I shall not divulge specific information related to the work or calls I have heretofore processed, upon termination of my employment at CapTel or at any time thereafter.
- I shall not disclose information which could be used to identify specifics about a particular consumer to anyone except a member of the administrative team according to the guidelines documented above.
- I shall not act upon any information received via a CapTel call.
- I shall not listen to, get involved in, or position myself to observe a CapTel call being processed by another employee.
- I shall not disclose information which could be used to identify specifics about any employee
 including, but not limited to, name, CA number, and schedule, except as is necessary to
 appropriate individuals and/or institutions or services.
- I shall not divulge my personal CA number in conjunction with my name except as required by a member of the administrative team.
- I shall not disclose the technical aspects of my position to anyone not employed by CapTel/Ultratec.
- I shall not bring visitors, including children, onto the call floor.
- I shall remain off of the call floor if I am not scheduled to be at work.

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gnature and Date

Sprint Confidentiality Form

IN CONSIDERATION of: (1) my employment with Sprint or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation, (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

- 1 ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL. I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
- 2 NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES. I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
- 3 NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
- 4 NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
- 5 TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.
- 6 I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.
- 7 ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.
- I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action

that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE AND DATE

MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

The Federal Relay provides a transparent link of telecommunication between typed/signed/voice (disabled) and voiced (non-disabled) messages. As part of the relay services organization all employees and subcontractors are bound to the following rules and regulations:

- All Federal Relay call related information is to be strictly confidential.
- Nothing is to be edited or omitted from the content of the conversation or the spirit of the Federal Relay user.
- Nothing is to be added or interjected into the content of the conversation or the spirit of the Federal Relay user.
- To assure maximum user control, the employee will be flexible in adapting to the caller's needs.
- Employees and subcontractors will strive to further competency in skill and knowledge through continued training, workshops and reading of current literature in the field.

~ Employee and Subcontractor Role ~

- 1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
- 2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
- 3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
- 4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
- 5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as \$5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
- 6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than \$1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
- 7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000.00.
- 8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.
- 9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of

- Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).
- 10)This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

I have read and fully understand the Federal Relay Code of Ethical Behavior. I agree that failure to do so will lead to disciplinary action that may include termination. I agree to process calls in the manner required by the Federal Government as detailed in the Federal Relay contract. I agree to abide by this Code of Ethics even after my employment with Sprint and/or subcontractor ends.

Etnics even after my employment with Sprint and/or subcontractor ends.
Employee/Subcontractor Signature Date
Supervisor Signature Date
Company Name (Print or Type)
Service Type (check one) Captioned Telephone/CapTel Relay Conference Captioning/RCC Telecommunications Relay Service/TRS and/or Internet Relay (a.k.a. Federal IP Relay)
Note: All of Sprint's Employees and subcontractors working on this contract will be acquainted with the applicable portions of FIRMR, the Privacy Act of 1974, and the Freedom of Information Act, and implementing regulations and policies. The employees and subcontractors will also be given copies of the following criminal and civil disclosure and inspection penalties, in full text, IRC 7213, IRC 7213A, and IRC

7431.

Appendix D: Disaster Recovery

Sprint offers emergency options and uninterruptible power that exceeds the State's minimum requirements by offering an end-to-end approach that is unmatched in the relay industry. Sprint has emergency operations and uninterruptible power systems (UPS) supporting relay call centers, the TRS switches (located at wireline switch sites). Sprint knows a large-scale loss of commercial power is one of the most critical factors impacting access to communication. We have proven programs to keep that from impacting relay services. Both TRS and CapTel offer uninterruptible power supplies and generators to ensure relay users will continue to have access to the service in the event of power outages.

Call Center Power Solutions

Sprint provides a cost effective solution with a UPS using a combination of standard battery backup and an auxiliary generator to provide uninterrupted power for an unlimited duration for key components.

- The switch peripherals
- Switch room environment, including:
- Air conditioning, if required to maintain service
- Fire suppression systems
- Emergency lights and system alarms
- CA consoles/ terminals
- CA work site emergency lights
- Call Detail Recording (CDR)

Sprint ensures the UPS system capacity is sufficient to operate the call center during busy season and busy hour load. Sprint has installed power-generating equipment capable of operating call centers for extended periods. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied. As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

Emergency Procedures Training

All Sprint Relay employees are trained on emergency procedures to minimize or prevent disruption to relay users. Sprint instructs its staff on the procedures to be followed in the event of an emergency or service impacting issue. Sprint provides annual training to ensure familiarity with systems and processes. Ad-hoc training is conducted for new procedures or team members.

Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

 Tabletop Exercises: In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.

- Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.
- Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.
- Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster.
 They may involve a combination of response teams, management, field operations, and outside agencies.
- After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted
 to ask participants to identify areas of success and improvement. These are documented
 as Lessons Learned and tracked to satisfactory completion.
- Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Business Continuity

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, FEMA, Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301, and several Military Specifications (Mil-Spec) standards. Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Relay network has a Business Continuity (BC) plan to deal with all types of natural and manmade problems which may prevent calls from reaching the relay center or impact the operation of the TRS platform. The plan identifies how Sprint minimizes impact to relay users and restores relay services. Sprint brings more value when it comes to maintaining operations during natural and man-made events. Sprint's BC methodology and implementation standards are consistent with industry-wide best practices and trusted by experts in the field. The Sprint dedicated BC Teams (BCTs) participate in government-provided and private sector training, and maintain certifications from:

- DRII
- International Association of Emergency Managers (IAEM)
- DHS
- Business Continuity Institute (BCI)

Sprint understands the BC challenges faced by government organizations and has designed state relay services accordingly. Sprint has experience in serving more than 160 federal entities and more than 150 military bases worldwide including the Department of Defense (DOD), State/Local Governments, Law Enforcement, and DHS.

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, Telecommunications Service Priority (TSP) and Critical Life Circuits are re-established.

All departments within Sprint, including the Sprint Relay program, follow these well-established

programs to ensure top-notch support for our customers.

Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

Traffic will be re-routed immediately to other call centers not impacted and work with those call centers to increase staffing, as needed. Once the issue is resolved, all communication assistants (CAs) return to the center and the incident is fully documented.

Proactive Measures

Over the past 26 years, Sprint Relay users have rarely experienced any type of inability to place calls. Sprint's backup capabilities are unmatched in the TRS industry with 6 call centers (including the location at Sprint headquarters in Overland Park, KS) capable of handling TRS calls and multiple switch locations supporting the TRS platform.

Sprint's switches and call centers are staffed with spare positions and platform components to deal with all types of technical issues. The TRS platform offers automated alarming to notify personnel of issues.

Redundancy is built into our infrastructure to deliver outstanding performance for all of our TRS customers. These attributes will ensure functional equivalency for state relay service callers during disasters. The benefits of our leading-edge platform and flexible configuration include:

- Switches, call controllers, and databases are housed in geographically-dispersed locations that conform to "critical" grade physical security requirements. Sprint's switches and peripherals are located at switch sites in telecom bunkers.
- Redundant connections between switch sites, 800 network, and call centers
- If the problem is within Sprint's TRS center, maintenance can usually be performed from Sprint's centralized center, the CCSA.
- Sprint retains hardware spares at each center to allow for the most common type of repair required without the ordering of additional equipment (except for complete loss of a building).
- Centralized routing and reporting systems enables Sprint to treat the entire call center complex as a single virtual call center rather than standalone call centers
- All TRS positions are capable of handling calls for any State customer.
- All training seats are configured and immediately ready to take production traffic.
- Sprint has pre-established plans for all types of outages.
- Sprint automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs to evacuate, the call router automatically sends calls to other relay centers.

Sprint has historically been the best at dealing with natural and man-made disasters that have caused outages. With each incident Sprint has managed to be prepared, respond and ensure ongoing service delivery. Sprint's processes as detailed here take into consideration every aspect

of an outage and/or natural disaster that includes a higher call volume likelihood due to the natural disaster. Some examples of disasters that affected Sprint facilities in the past are:

- Wind burst that blew off a portion of the roof of our Syracuse, NY call center
- Farmer cuts Fiber Optic cable servicing Lubbock, TX when burying a cow
- Hurricanes that impacted call centers in Miami and Jacksonville
- Tornado warnings impacting upper Midwest call centers. One evening, 37 Tornadoes were within range of our call center. Our center had to be evacuated. Sprint continued to provide service without interruption.

These list just a few of the natural and man-made disasters we faced, and with each one we were able to maintain our service levels with the processes we have in place. Our employees are the best at ensuring we maintain these service levels.

TRS Data Center Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

TRS Winter Preparedness Plan

Sprint has processes in place if a known weather event is encountered. These known contingency plans are designed to mitigate our customers' degradation of service and are maintained by the TMCC. Each service has back-up locations to ensure redundancy.

Known Event

- Four days prior TMCC and Ron Peay (Operations Manager) will make a determination as to the severity and number of centers which might be affected.
- Three days prior TMCC and Ron will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify John Moore (Manager Customer Relations) and CCSA of our "game plan"
- Two days prior TMCC will meet with Ron to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- One day prior TMCC will meet with Ron to update impacts and plan.
- Day of Event TMCC will invoke emergency call routing as required. TMCC will be the point of contact for all notifications. Affected centers will update TMCC every four hours. TMCC will update Ron who will update Business Continuity Manager through executive level. Management is also responsible for notifying the Business Continuity Team.

Unknown Event

The Activation Criteria Plan will be used when either weather or other events cause potential significant (excess of 25 percent) increase in call volumes or one or more TRS call centers is off-line for more than two hours, using the following procedure:

- Automated alarming and/or TRS call center notifies TMCC
- TMCC contact CCSA
- CCSA sends notification to a pre-established distribution list

CCSA establishes a conference call to work on resolving the issue with impacted groups

After fix agencies are unable to re-establish center operations – the Business Continuity Plan (BCP) is invoked and Management will notify the Business Continuity Management Team.

CapTel-Specific Disaster Recovery Information

CapTel, Inc. (CTI) and Sprint have worked together to develop a complete plan for dealing with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. Performance at the CapTel call center is monitored continuously by CTI technicians 24/7. Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes disruption either:

CapTel has established contingency plans in the event of a complete and extended loss of a CapTel call center. The plan includes a number of steps based on the estimated duration of the outage and takes advantage of the relative short travel time between the Wisconsin CapTel call centers. The first phase is organized to initiate the recovery process within hours and can be fully completed within days. This involves expanding service into available space in the operating call center locations and other CapTel facilities

- All training seats are configured and immediately ready to take production traffic.
- Additional production seats are established in unused and available space within the existing facilities.
- Regular shuttle services are established to transport qualified CapTel CAs and staff from the outage area to and from the expanded facilities.

The recovery plan includes a second phase for extended outages. To support this longer duration, CapTel has identified additional disaster recovery locations with appropriate facilities in the metropolitan area of each of the call centers.

The addition of the Orlando, FL and Sprint's TRS/CapTel call centers has alleviated many of the inclement weather challenges presented by the winter season. However, if inclement weather affects the CapTel staffs' ability to arrive to work, in most cases, with minor adjustments, CTI can still meet the call volume demand with enough staff coverage in a wide range of snow fall amounts. However, if necessary, Sprint and CTI will institute proven tactics, as necessary, to motivate, encourage, and enable CapTel CAs to be present or to pick up additional hours so CTI can meet its service level requirements during inclement weather

Customer Notification Procedures

Sprint will inform the state contract manager of any major interruptions to the TRS/CapTel service that exceeds five minutes in duration or isolates part of the state. To provide the contract manager with the most complete and timely information on problems affecting relay service, Sprint's trouble reporting procedure for TRS and CapTel includes multiple levels of response:

- Immediate notification of events that last 5 minutes or isolate part of the State
- Notification when the issue is resolved and/or status updates (every 24 hours)
- Comprehensive final report within 3 days

Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals the problem has been corrected and full relay service has been restored. The state contract manger (or designate) will receive this notification from your Sprint Customer Relationship Manager (CRM). He/she and/or a member of the management team will provide the final report and follow up on steps

Sprint will take to ensure we can minimize the likelihood of this event occurring again.

Final reports include a comprehensive look at the event, including the following:

- How the problem occurred
- When the problem occurred
- The number of impacted customers (if known)
- What was required to correct the problem
- Time and date the relay service resumed full operation
- Avoidance plan for future (if applicable)

Temporary Delay Message

If approved by the state, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as: "THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

Telecommunications Service Priority (TSP)

All of Sprint's circuits supporting TRS and CapTel services have qualified for priority restoration under the TSP program. Sprint's participation in the TSP Program strengthens our robust reliability. If a national or regional emergency causes service to be disrupted and the call center cannot receive or place calls, Sprint's participation in the TSP program means Local Exchange Carriers (LECs) would be required to restore service as rapidly as possible consistent with the priority status assigned. Sprint's reliable network and TSP participation ensures Sprint's disaster recovery ability is unmatched by any Relay provider in the world.

Nebraska Relay Makes Telecommunications Accessible for Nonstandard Phone Users



What is Nebraska Relay?

Nebraska Relay is a free, completely confidential 24-hour public service that makes the use of the telephone possible and a better experience for many thousands of citizens and visitors of the state who are deaf, hard of hearing, deaf-blind, speech-disabled, and hearing.

How does Nebraska Relay work?

The person dials the toll-free Nebraska Relay number and gives the communications assistant (often abbreviated as the CA) the area code and number of the person receiving the call. An example of a Nebraska Relay service is a highly trained CA who voices the typed comments by the TTY (text telephone) user and types the spoken comments by the other person back to the TTY user. Nebraska Relay provides several options to meet the needs of people who do not use the standard telephone.

How to connect to Nebraska Relay

 Dial:
 7-1-1 *
 Voice Carry-Over:
 1-877-564-2481

 TTY:
 1-800-833-7352
 Hearing Carry-Over:
 1-800-833-7352

 Voice:
 1-800-833-0920
 Speech-to-Speech:
 1-888-272-5527

 ASCII:
 1-888-696-0629
 Spanish-to-Spanish:
 1-888-272-5528

Spanish-to-English: 1-877-564-3503

* Some buildings with a PBX telephone system (often in hotels and offices that have extension numbers) make reaching 7-1-1 not possible. The above 800 numbers can be dialed when not able to get through to 7-1-1.

CapTel®—a free captioned phone service

CapTel, short for captioned telephone, users place calls in the same way when dialing with a standard telephone. Utilizing voice recognition technology that displays verbatim captions of the conversation on screen of a telephone or computer screen, the CapTel user can hear and read what the other person is saying.

How do I apply for specialized telephone equipment?

The Nebraska Specialized Telecommunications Equipment Program (NSTEP) provides qualified applicants (proof of a disability that makes using a standard telephone difficult or impossible) with vouchers to purchase assistive telephone equipment. A person can apply for a voucher by visiting www.nebraskarelay.com/nstep or calling 1-800-526-0017 Voice/TTY or the Nebraska Commission for the Deaf and Hard of Hearing at 1-800-545-6244.

Learn more about Nebraska Relay

Nebraska Relay Website: www.nebraskarelay.com

Nebraska Relay Customer Service: 1-800-676-3777 (TTY/Voice/ASCII)

Nebraska Relay Spanish Customer Service: 1-800-676-4290 (TTY/Voice/ASCII)

CapTel Customer Service: 1-888-269-7477 (Voice/CapTel/TTY)

CapTel Spanish Customer Service: 1-866-670-9134 (Voice/CapTel/TTY)

Sprint TTY Operator Service: 1-800-855-4000

Services supported by surcharge

A few cents per telephone bill surcharge makes Nebraska Relay services possible for the citizens of Nebraska. Sprint is the provider of the relay services for Nebraska.



7-1-1 is not an emergency number

Some people might assume it is okay to call 7-1-1 for emergencies. The 7-1-1 Nebraska Relay number is for relay service calls only. The Americans with Disabilities Act (ADA) requires that 911 centers be prepared to handle emergency calls from people who use the text telephone. Nebraska Relay will make every effort to assist a person during an emergency but cannot serve in the same function as 911 centers. Nebraska Relay does not assume responsibility for handling emergency calls.



Nebraska FCC Complaint Log 2012-2013

Complaint Tracking for Nebraska (June 2012 - May 2013). Total Customer Contacts: 2

Tally	ally Date of Complaint Nature of Complaint	Nature of Complaint	Date of Resolution	Date of Resolution Explanation of Resolution
	1 04/06/13	Customer's daughter reported being unable to place captioned calls to the CapTel 800 in 1-Line mode.	04/24/13	A Customer Service Representative worked extensively with the customer to explore and confirm their set up. Once all was confirmed in the set up, Technical Support opened a trouble ticket and worked with the carrier. Calls were also changed to route over another carrier's network which the customer's daughter confirmed resolved the customer's experience fully.
7	04/18/13	Customer's daughter indicated that the customer could call out but that when they tried calling, they experienced just silence.	04/21/13	Technical assistance confirmed that there was a problem with the phone network, which was resolved. The Customer Service Representative's subsequent contact with the customer confirmed that all was fine regarding her captioned calling.

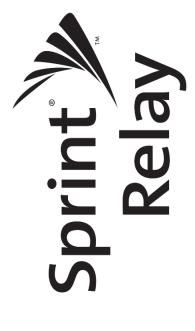


Nebraska FCC Complaint Log

2013 - 2014

Complaint Tracking for Nebraska (06/01/2013-05/31/2014). Total Customer Contacts: 1

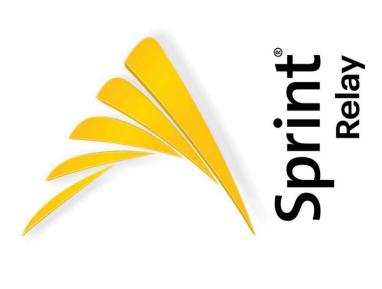
Tally	Tally Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
-	08/06/13	Customer states that she needed 911 for the police and when calling in to relay the Operator she said, "Please call 911." Customer said she wanted to put a complaint in on this problem. Apologized and suggested for her to obtain the 10 digit emergency number for their local area to update in her profile. In the future, the Operator would see the correct number to dial for the police if it was ever needed. Call back not requested	08/06/13	Operator was coached by a Supervisor on three digit dialing and emergency call procedures. Call back was not requested.



Nebraska FCC Complaint Log 2014-2015

Complaint Tracking for Nebraska (06/01/2014-05/31/2015). Total Customer Contacts: 3

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
~	01/22/15	Customer stated she just made a call and the Operator typed extremely slow. The customer said that if she had been talking to a business or doctor's office, they would have hung up on her due to the time it took for the operator to relay the call. Customer Service response: I apologized for the Operator's slow typing and let her know I would report the issue.	01/22/15	Supervisor addressed this issue with the Operator. Operator stated that she may have erroneously reduced the typing speed instead of the volume. The Voice Carry Over customer did not indicate about the typing speed otherwise the Operator would have increased the typing speed. Operator apologized for the inconvenience.
N	02/03/15	Customer shared feedback regarding the accuracy of captions on her calls.	02/03/15	Customer Service Representative apologized for the incident and thanked the customer for sharing their experience. Customer Service Representative discussed the customer's overall experience with captions but the customer did not have a specific call to report. Customer Service Representative advised the customer that if she documents the date time and Communication Assistant ID of any future calls we will can take specific follow up action with the Communication Assistant's Supervisor and Communication Assistant on the call to provide increased mentoring and coaching for optimal performance. The customer said the captions on the call with customer service were great.
ო	05/23/15	The customer stated that the Operator was unresponsive and failed to keep her informed. The customer did admit that she was calling a pharmacy where they were familiar with her and with relay calls, but because it was the weekend, the person taking the call may not have been familiar with her or with relay calls. The customer service representative apologized for the trouble and assured her that the information would be passed on to the Operator's Supervisor. The customer did not request follow up.	05/23/15	Operator was coached by a Supervisor to keep the customer informed about the progress and status of the call.



Nebraska FCC Complaint Log

2015 - 2016



Nebraska FCC Complaint Log

2016 - 2017

Complaint Tracking for Nebraska (06/01/2016-05/31/2017). Total Customer Contacts: 2

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
_	06/16/16	Customer stated she has issue placing a local call. A trouble ticket was entered. She would like a follow on this matter as well as the trouble ticket number. Supervisor apologized for the inconvenience.	06/16/16	The technicians fixed the platform and now the customer can make calls. Left a message on the customer's TTY letting her know it is working.
2	06/16/16	Nebraska customer was not able to make a local call in area code 402. A trouble ticket was opened. Temporary fix put in effect. No follow up requested.	06/16/16	This dialing issue was corrected by deploying an updated version of the Phoenix application server. It was incorrectly flagging area code 402 as international.

January-December 2014



Annual Report

Make calls anytime.

CONTENTS

03	From the Customer Relations Manager
04	Outreach Education
06	Relay Enhancements
08	Sprint Relay Team
11	Appendices



Educated nearly 23,000 people at exhibits and events.

RECERTIFIED BY THE FCC FOR FIVE YEARS.

2014

AWARDED CONTRACT TO PROVIDE RELAY SERVICES UNTIL 2019.

[FROM THE CUSTOMER RELATIONS MANAGER]

Steve Stovall Nebraska Public Service Commission 300 The Atrium 1200 N. Street Lincoln, NE 68508

Dear Mr. Stovall,

Sprint Relay had another opportunity to serve Nebraska consumers during the calendar year of January- December 2014 by providing relay services, outreach education and customer service. Sprint is appreciative of the new contract awarded through June 30, 2019.

Nebraska Relay provided:

- Outreach education at 14 events across the state
- Relay information to 1,506 consumers
- Advertisements in four different publications
- The completed Interstate TRS Fund Data Collection report
- NPA-NXX map infographics for both TRS and CapTel

Billable minutes this fiscal year showed:

- TRS: A moderate decrease of 19.4% or 25,639 minutes
- Speech-to-Speech: An increase of 72.2% or 723 billable minutes
- CapTel: A decrease of 8.1% or 18,125 minutes

Sprint thanks the Nebraska Public Service Commission administration, the Nebraska Relay outreach specialist and the state relay users for the opportunity to provide relay services and education. We look forward to working with all Nebraskans the next five years!

Sincerely,

Emma Danielson

Emma Danulson

Customer Relations Manager



OUTREACH EDUCATION

Outreach Activities

Nebraska Relay promoted relay service awareness through product and service demonstrations, exhibitions, presentations and information dissemination and at www.nebraskarelay.com. With a focus on traditional Telecommunications Relay Services (TRS), Speech-to-Speech (STS) services, and CapTel services and support from the Nebraska Relay contractor, outreach activities included exhibitions or presentations at:

Date	Event	City	Target Audience	Number of Participants	Presentation Demonstration Exhibit		
	FEBRUARY						
25	University Sertoma Club	Lincoln	Sertoma members	15	Presentation and Demon- stration		
			APRIL				
8	Hearing Loss Association of America	Omaha	HLAA members	22	Presentation and Demonstration		
12	2014 Omaha Health Expo	Omaha	General Public	400	Exhibit		
13	2014 Omaha Health Expo	Omaha	General Public	200	Exhibit		
24	CI Sertoma Club	Lincoln	Sertoma Members who have Cochlear implants	26	Presentation and Demonstration		
			MAY				
1	Joint Agency Meeting	Gering	General Public	45	Exhibit		
	JUNE						
3	CapTel Training/Installation	Kearney	CapTel Customer	1	Installation/Training		
3	CapTel Training/Installation	Hastings	CapTel Customer	1	Installation/Training		
	SEPTEMBER						
9	Huskers Harvest Days	Wood River	Farmers/General Public	350	Exhibit (2 days rained out)		
15	Westside Lions Club	Omaha	Lions Members	16	Presentation		
19-21	Railfest	North Platte	General Public	326	Exhibit		
25	Nebraska Speech, Language, Hearing Association Conference	Lincoln	Members of NSLHA	102	Exhibit		
30	CapTel Training/Installation	Lincoln	CapTel Customer	1	Installation/Training		
DECEMBER							
22	CapTel Training/Installation	Lincoln	CapTel Customer	1	Installation/Training		
			TOTAL	1,506			



Outreach Materials

CapTel Flyer

To educate consumers on Nebraska Relay services, a CapTel flyer was placed with different media outlets:

- Nebraska Farmer Magazine (March, May, September, and November)
- Nebraska Academy of Family Physicians Magazine (November)
- The Voice Newspaper in southeastern Nebraska (December)





TDI Directory

In Spring 2014 Nebraska Relay placed a flyer about TRS, CapTel, Customer Service, and equipment distribution program (NSTEP) phone numbers and website address in the national Telecommunications for the Deaf and Hard of Hearing, Inc., directory (see flyer at left).

TDI has published its directory annually since 1968. This significant resource includes over 500 pages of contact information for thousands of individuals, businesses, organizations and government agencies that serve the deaf community.

Website Statistics



The Nebraska Relay website, at www. nebraskarelay.com, provides information and videos explaining how calls are handled, offers an online consumer form for personal preferences, outlines the Nebraska Specialized Telecommunications Equipment Program (NSTEP), and has additional resources.

To monitor trends on the website, the Customer Relations Manager received a monthly statistics report. During this reporting year, there were 137,590 hits, representing the requests made to the server. This is an increase of 18%, or 21,007 hits, compared to the previous year's figures. The higher numbers from August to October may be attributed to the exhibit work the Commission for the Deaf and Hard of Hearing performed during "Senior Day" at the State Fair, and with Nebraska Relay during the Husker Harvest Days trade show in September.

Fig. 1: Webs	ite Statistics
Month	Hits
January	9,892
February	11,601
March	10,239
April	10,554
May	8,734
June	9,303
July	9,874
August	18,475
September	14,021
October	13,419
November	11,063
December	10,415

TRS ENHANCEMENTS



Enhanced Speech-to-Speech Services

In March 2014, Sprint made several enhancements to its Speech-to-Speech (STS) services, such as additional features shown in the postcard at right.





Osher Lifelong Learning Institutes

Relay South Carolina, in partnership with Sprint, presented a program at the Furman University Osher Lifelong Learning Institutes (OLLI) in Greenville, South Carolina, in March 2014. The program was designed to raise awareness about communication solutions for people with hearing loss.

The first OLLI course presentation, lasting five hours, covered various topics, such as hearing loss types, hearing aid and cochlear implant features,

telecommunication equipment, smartphone applications, and public accommodations (including television and movie captioning). Also shared were newer resources available to individuals with hearing loss that help ensure independence and reduce stress.

STARS Conference

Sprint sponsors an annual conference for State Telecommunication Administrators of Relay by Sprint (STARS). The STARS conference is an ideal forum for discussions about current FCC rules and upcoming industry trends,

SPRINT RELAY ACCOUNTS

Sprint provides relay services for 34 accounts including Federal Relay Service, Puerto Rico, Virgin Islands and New Zealand, as shown in the map at right.





and idea exchanges among state relay administrators. This year's STARS conference was held in Florida in May 2014.

CapTel Phones in Sprint Stores

In May 2014, Sprint performed a trial of CapTel phones in Sprint wireless retail stores to evaluate how consumers shopping for wireless phones responded to learning about wireline IP-based Sprint CapTel 840i Customer Premise equipment. This initiative was in preparation for the deployment of the CapTel 840i phone to more than 1,200 retail stores in the nation. Each customer will receive installation

and support services. The trial took place in 20 stores in southern Florida, 5 stores in Texas, and 5 stores in Washington.

Emerging Text-to-911 Technology

Text-to-911 technology is the ability to request emergency assistance by sending, on a wireless phone, a text message to a public safety answering point (PSAP). While this technology may be most utilized by the deaf, hard of hearing, and speech-disabled communities, it is expected to be increasingly used by the general public. Text-to-911 is also intended as an option for when voice calling is unavailable or unsafe, such as during domestic violence incidents.

Sprint now provides text-to-911 service. Sprint currently routes enhanced wireless 911 calls to 198 PSAPs in Florida. Additional service areas will take up to six months to implement. Sprint is enthusiastic about expanding the public's ability to get critical assistance. Towards that end, Sprint continues actively participating in



standards bodies and industry working groups, along with cooperative efforts with PSAPs across the country. As part of these efforts, Sprint evaluated vendors and participated in a six-month text-to-911 trial with different jurisdictions across the country prior to launching the service. Sprint is proud to have such innovative partnerships and to be a strong contributor to emergency communications.

Employee of the Year Award

In May 2014, Mike Ellis, National Director for Sprint Relay, was named one of the 2014 "Employees of the Year" by CAREERS & the disABLED Magazine for his professional and advocacy efforts on behalf of people with disabilities in the workplace and in the community. Ellis was one of only 10 employees recognized.

Employee Resource Group

John Moore, the Sprint Relay branch manager for the Relay Program Management team, has been promoted to president for the Sprint Employee Resource Group: REAL DEAL. In his last year of this two-year term, he serves as the point of contact for resource information and guidance on disability information, with an emphasis on deaf- and vision-related matters.

RELAY STATISTICS

Telecommunications Relay Service

The following information indicates the trends in the annual total number of billable session minutes, billable speech-to-speech minutes, number of calls, average speed of answer and service level, contacts with customers, and calling trends. The numbers reflect the traditional relay services (such as TTY, Voice, Spanish TTY and Voice, Voice Carry-Over [VCO], Telebraille, and Speech-to-Speech [STS]) currently provided by Nebraska Relay.

See appendix for a complete statistics report.

Billable Session Minutes

Figure 2 indicates the total monthly billable session minutes processed through Nebraska Relay. The total of 106,328 minutes includes all aspects of TRS services except interstate, interstate directory assistance, international, toll-free conversation, 900 numbers, Speechto-Speech and CapTel. This represents a moderate decrease of 19.4%, or 25,639 minutes, compared to the previous calendar year's figures.

Fig. 2: Session Minutes

January	10,003	July	7,313
February	9,782	August	6,938
March	8,907	September	7,921
April	9,849	October	7,855
May	10,060	November	7,815
June	10,780	December	9,106

Billable Speech-to-Speech Minutes

This calendar year contained 1,725 Speech-to-Speech (STS) billable minutes. Sprint Relay, in partnership with the United Cerebral Palsy (UCP) organization, promoted STS as part of its national campaign to educate STS users on its enhanced STS features. That led to a large increase of 72.2%, or 723 minutes, compared to the previous year's figures. Figure 3 shows a monthly breakdown.

Fig. 3: STS Minutes

January	213	July	82
February	114	August	60
March	80	September	151
April	158	October	214
May	107	November	147
June	119	December	279

Relayed Call Volume

Figure 4 depicts the total number of outbound relayed calls processed through Nebraska Relay. The calls include local, intrastate (both intralata and interlata), interstate, toll-free, directory assistance, 900, international, marine, other, general assistance, and busy ring/no answer. For this reporting period, there was a decrease of 9.6%, or 5,394 calls, compared to the previous year's figures.

Fig. 4: Relayed Call Volume

January	4,072	July	4,395
February	4,128	August	4,218
March	4,030	September	4,438
April	4,295	October	3,909
May	4,609	November	3,651
June	5,073	December	4,017

Average Speed of Answer and Service Level

Figure 5 illustrates that Sprint has once again exceeded the speed of answer requirement throughout the year. "Speed of answer" identifies the number of seconds required to answer a call. Nebraska Relay's daily requirement is that 90% of all calls are answered within 10 seconds. The Average Speed of Answer (ASA) for this fiscal year was .7 seconds and the Service Level (SVL) was that 96.9% of calls were answered within 10 seconds.

Fig. 5: ASA and SVL

Month	ASA	SVL	Month	ASA	SVL
January	1.0	95%	July	.8	96%
February	.7	95%	August	.8	98%
March	.8	96%	September	.5	99%
April	.6	96%	October	.6	99%
May	.6	97%	November	.7	98%
June	.8	96%	December	.7	98%

FCC Annual Consumer Contact Log

Sprint prepares and submits an annual Consumer Contact Log Report on both TRS and CapTel to the Nebraska Public Service Commission administration, who then submits the report to the Federal Communications Commission. From this calendar year of January to December 2014, there were 0 TRS complaints, 0 TRS commendations and 467 TRS inquiries.

Calling Trends

Figure 6 indicates where Nebraska TRS calls originated during May 2014. The highest concentrations are shown in red, yellow, and then green.

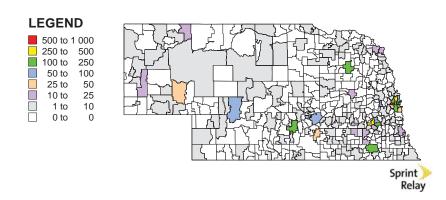


Fig. 6: Calling Trends

CapTel

The following information indicates the trends of the annual total number of billable conversation minutes, call volume, contacts with customers, and calling trends. The numbers reflect CapTel relay services currently provided by Nebraska Relay.

Billable Conversation Minutes

A breakdown of monthly minutes is shown in Figure 7. This fiscal year's billable CapTel conversation minutes totaled 206,794. This represents a decrease of 8.1% compared to the previous year's figures.

Fig. 7: CapTel Conversation Minutes

January	19,996	July	18,202
February	18,921	August	16,628
March	18,114	September	16,234
April	16,057	October	16,403
May	18,057	November	14,342
June	18,043	December	15,798

Call Volume

A total of 92,079 CapTel calls were generated this reporting year. A breakdown of monthly call volume is displayed in Figure X, which represents an 11.1%, or 11,470-call, decrease from last year.

FCC Annual Consumer Contact Log

Sprint prepares and submits an annual Consumer Contact Log Report on both TRS and CapTel to the Nebraska Public Service Commission administration, who then submits the report to the Federal Communications Commission. From this calendar year of January to December 2014, there were 0 CapTel complaints, 1 CapTel commendation and 58 CapTel inquiries.

Fig. 8: CapTel Call Volume

January	8,447	July	8,214
February	7,365	August	7,506
March	7,748	September	7,385
April	7,562	October	6,948
May	8,948	November	6,353
June	8,466	December	7,137

Calling Trends

Figure 9 indicates where Nebraska CapTel calls originated during May 2014. The highest concentrations are shown in red, then yellow, then green.

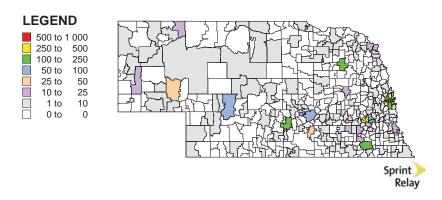


Fig. 9: Calling Trends

SPRINT RELAY TEAM

Nancy Salisbury

Regional Vice President General Business - West

Mike Ellis

National TRS Director

Relay Program ManagementJohn Moore

Branch Manager

Mark Seeger

Branch Manager

Emma Danielson

Customer Relations Manager

Relay Business Innovations
Mark Tauscher

Branch Manager

Angie Officer

Implementation Program Manager

Corporate Sales Maggie SchoolarBranch Manager

Chris Smith

Corporate Sales Manager

Billing Kris Owara

Analyst

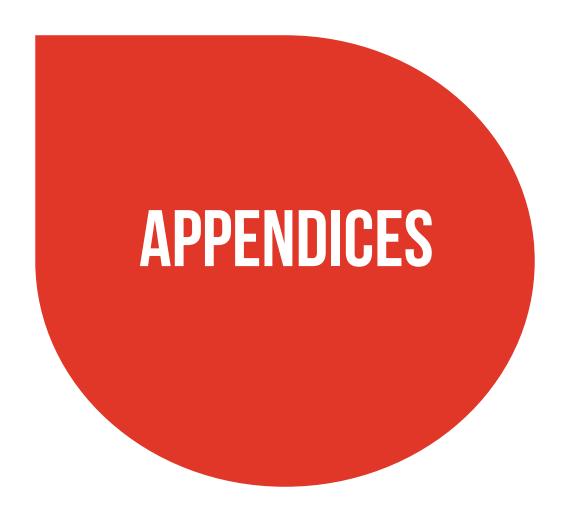
Wireless Sales
Art Moore

ALLIVIOOIC

Account Executive

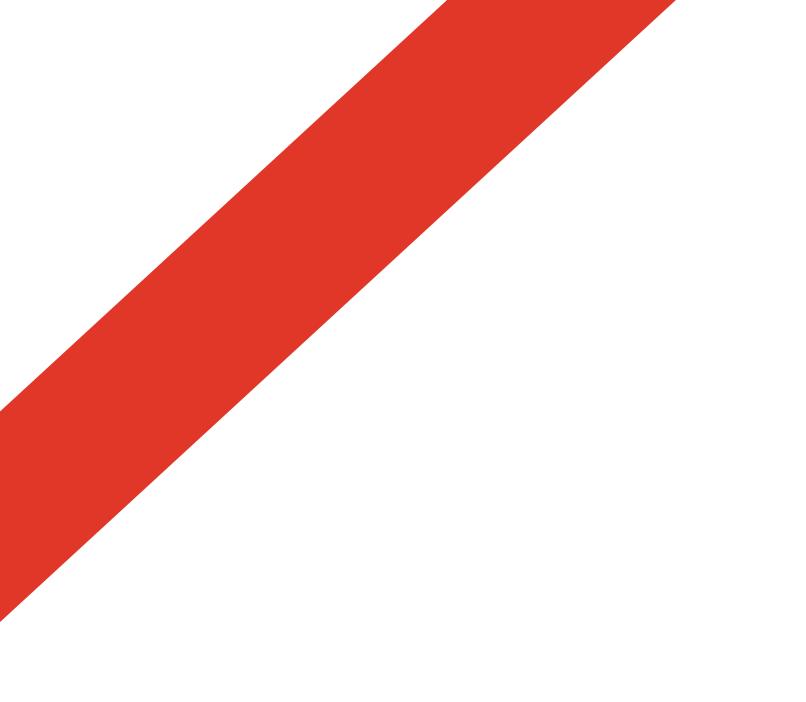
Customer ServiceBrian Adamson

Supervisor



TRS STATISTICS

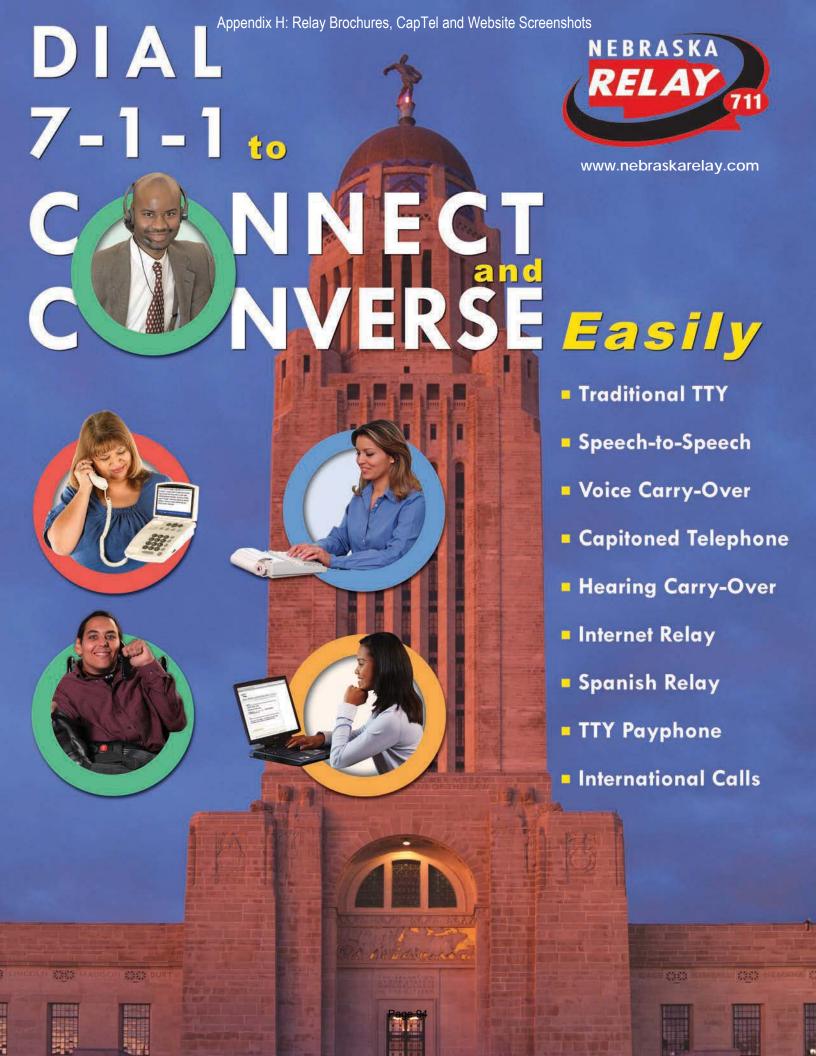
RELAY SERVICE INFORMATION	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	ОСТ.	NOV.	DEC.	TOTAL
Incoming Calls Offered	3,634	3,734	3,688	3,905	4,087	4,451	4,008	3,832	3,977	3,603	3,143	3,818	45,880
Incoming Calls Answered	3,519	3,591	3,578	3,799	3,989	4,327	3,883	3,686	3,883	3,509	3,044	3,676	44,484
Abandoned in Queue	115	143	110	106	98	124	125	146	94	94	99	142	1,396
Blockage	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Number of Relayed Calls (Line 5)	4,072	4,128	4,030	4,295	4,609	5,073	4,395	4,218	4,438	3,909	3,651	4,017	50,835
Total Number of Completed Calls	1,649	1,543	1,407	1,568	1,815	1,866	1,420	1,362	1,457	1,274	1,497	1,275	18,133
Total Number of Subscribers/Users	1,624	1,814	1,909	1,843	1,862	2,108	1,963	1,941	1,829	1,776	1,465	1,966	22,100
Average Weekend Calls	89	104	87	108	112	136	104	105	111	77	91	83	1,207
Average Weekday Calls	146	165	150	156	164	183	155	151	161	143	137	146	1,857
SERVICE QUALITY													AVG.
Average Speed of Answer (ASA)	1.0	0.7	0.8	0.6	0.6	0.8	0.8	0.8	0.5	0.6	0.7	0.7	0.7
Service Level (SVL)	95%	95%	96%	96%	97%	96%	96%	98%	99%	99%	98%	98%	97%
													TOTAL
Complaints: TRS	0	0	0	0	0	0	0	0	0	0	0	0	0
Commendations: TRS	0	0	0	0	0	0	0	0	0	0	0	0	0
TRS Inquiries	66	24	79	48	37	19	43	25	31	49	20	26	467
RELAY MINUTES OF USE													TOTAL
Total Session Minutes of Service	11,486	10,785	9,846	10,708	10,954	11,966	8,207	7,689	8,691	8,784	8,633	9,868	117,617
Less Interstate Minutes	780	495	439	177	274	473	300	312	148	291	202	257	4,148
Less International Minutes	0	0	9	2	0	0	1	0	0	0	0	0	12
Less Interstate Toll-Free Minutes (51%)	703	508	488	679	619	706	593	439	621	638	617	504	7,115
Less Interstate Directory Assistance	0	0	4	0	0	7	0	0	0	0	0	2	14
Less 900 Minutes (51%)	0	0	0	0	0	0	0	0	0	0	0	0	0
Billable Minutes to State of NE	10,003	9,782	8,907	9,849	10,060	10,780	7,313	6,938	7,921	7,855	7,815	9,106	106,328
SPEECH-TO-SPEECH	242	111	00	450	107	110	00	40	242	220	240	270	TOTAL
Total Speech-to-Speech Minutes	213	114	80	158	107	119	82	60	312	230	218	279	2,131
Less Interstate Minutes Billable Intrastate STS Session Minutes	259	114	80	158	107	125	82	60	151	214	147	279	1 725
GRAND TOTAL BILLABLE SESSION MINS													1,725
	10,262	9,896	8,987	10,007	10,168	10,905	7,395	6,998	8,072	8,069	7,962	9,385	108,053 TOTAL
CAPTEL INFORMATION Call Count	8,447	7,365	7,748	7,562	8,948	8,466	8,214	7,506	7,385	6,948	6,353	7,137	92,079
Call Count	0,447	7,363	7,740	7,362	0,740	0,400	0,214	7,306	7,303	0,740	6,333	7,137	42,074 AVG.
Average Conversation Minutes Per Call	2.96	3.31	3.01	2.88	2.77	3.05	3.03	3.06	2.75	3.20	3.05	2.99	3.01
Average Speed of Answer (ASA)	0.54	0.51	0.47	0.47	0.60	0.43	0.42	0.44	0.55	0.68	0.61	0.70	0.54
Service Level (SVL)	99.4%	99.8%	99.9%	99.8%	97.0%	99.9%	100.0%	99.8%	99.4%	98.7%	99.1%	99.3%	99.3%
SERVICE QUALITY	77.476	77.076	77.776	77.078	77.078	77.7/6	100.0%	77.076	77.478	70.7 /8	77.176	77.576	TOTAL
Complaints: CapTel	0	0	0	0	0	0	0	0	0	0	0	0	0
Commendations: CapTel	1	0	0	0	0	0	0	0	0	0	0	0	1
CapTel Inquiries	12	1	2	3	6	2	11	4	3	7	2	5	58
Capter inquiries	12	'	2	3	0		11	4	3	,		3	TOTAL
Total CapTel Conversation Minutes	24,964	24,367	23,344	21,743	24,759	25,835	24,894	22,964	20,313	22,200	19,348	21,321	276,052
Less Interstate Conversation Minutes	3,794	4,214	4,077	4,341	5,119	6,136	5,199	4,674	2,516	3,965	3,807	4,130	51,972
Less International Conversation Minutes	21	1	0	0	1	0,130	0	0	2,310	2	25	0	51
Less Interstate Toll-Free Minutes (51%)	815	958	807	1,053	1,265	1,307	1,194	1,289	1,178	1,529	914	1,135	13,444
Less in 2 Line (11%)	338	273	347	292	318	349	299	372	383	302	260	258	3,791
Billable Intrastate CapTel Minutes	19,996	18,921	18,114	16,057	18,057	18,043	18,202	16,628	16,234	16,403	14,342	15,798	206,794
Billiable intrastate Capiter Williates	17,770	10,721	10,114	10,037	10,037	10,043	10,202	10,020	10,234	10,403	17,542	13,770	200,774



Publication Services provided by



T.S. WRITING SERVICES, LLC



Full Telephone Accessibility What is Nebraska Relay?



Nebraska Relay is a free service that provides full telephone accessibility to people who are deaf, hard-of-hearing, deafblind, or have a speech disability. This service allows text-telephone (TTY) or assistive equipment users to communicate with standard (voice) telephone users through specially trained relay operators.

Calls can be made to virtually anywhere in the world, 24 hours a day, 365 days a year with no restrictions on the number, length, or type of calls. All calls are strictly confidential and no records of any conversations are maintained.

Nebraska Relay is provided by Nebraska-based telephone companies collectively through a contract with Sprint.

How Does Relay Work?



TTY user types her conversation to the relay operator.

After TTY user types "GA,"

Use

Relay operator then voices TTY user's typed message to voice user.

Relay operator relays voice user's spoken words by typing them back to TTY user.



Page 95





7-1-1 is a telephone relay number that allows people who are standard (voice) telephone users, deaf, hardof-hearing, deafblind or who have a speech disability to access state relay services. Relay users can simply dial 7-1-1 to connect with Nebraska Relay. This allows easier access, particularly for less experienced relay users such as businesses or friends and family of TTY users.

Note:

If you have problems with 7-1-1 when calling through your switchboard (which usually is a PBX telephone system), you may need to contact your PBX administrator to have the system configured to allow 7-1-1 dialing.

If you are not on a PBX telephone system, and you cannot access Nebraska Relay when dialing 7-1-1, call a customer service representative at your local telephone company. It is possible that

7-1-1 Not Available:

WebCapTel[®]

Internet Relay

your local telephone company may not have established 7-1-1 dialing through its system.

PBX telephone systems are often in businesses, agencies, hotels and other places where extension numbers are used. And most often, a way around this issue is to dial the full 10-digit toll-free number.

If you continue to experience difficulties in dialing 7-1-1, contact the Nebraska **Relay Customer Service:**

800-676-3777

(TTY/Voice/ASCII/VCO/HCO)

Email:

Sprint.TRSCustServ@sprint.com

Español:

800-676-4290

(TTY/ASCII/HCO/Voz/VCO)

7-1-1 Available:

- TTY to Voice
- Voice to TTY
- Speech-to-Speech
- CapTel[®]
- Voice Carry-Over
- Hearing Carry-Over
- Spanish Relay
- TeleBraille

In case of emergency, TTY users should call directly the TTY-equipped center or emergency services center in their community.

The 9-1-1 operators have TTY machines and are trained to respond to all needs of people in Nebraska including those who are deaf or have hearing loss. 7-1-1 is **NOT** a substitute for deaf, hardof-hearing, deaf-blind, and speechdisabled residents who need emergency services.

HOWEVER, if you use a TTY and cannot obtain emergency services on 9-1-1, you may call 7-1-1 and tell the relay operator you have an emergency situation. The operator will then voice your emergency to the Nebraska Local or State Police. Page 96



emergency number. 7-1-1 should not be confused with 9-1-1.

7-1-1 is NOT an



Dial and Converse Easily

TTY to Voice

7 • 1 • 1

800 • 833 • 7352

nebraskarelay.com/tty

Some people who are deaf, hard-of-hearing, or deafblind use a TTY to type their conversation to a relay operator, who then reads the typed conversation to a hearing person. The relay operator relays the hearing person's spoken words by typing them back to the TTY user.

How to Make a TTY to Voice Phone Call:

- 1. Dial the TTY relay number.
- 2. The relay operator will answer with "RELAY OPR 2345" (for relay operator identification), F or M (for relay operator gender) and GA. (GA stands for Go Ahead.)
- **3.** Type in the area code and telephone number you wish to call and then type GA.
- 4. The relay operator will dial the number and relay the conversation to and from your TTY. Type in GA at the end of each message.
- 5. When you finish the conversation, type SK (Stop Keying) and then hang up.



Voice to **TTY**

7 • 1 • 1

800 • 833 • 0920

nebraskarelay.com/voice

Standard telephone users can easily initiate calls to TTY users. The relay operator types the hearing person's spoken words to the TTY user and reads back the typed replies.

Tips for Hearing Callers:

- Be sure to talk directly to your caller, avoid saying "tell him" or "tell her".
- Say "GA" or "Go Ahead" at the end of your response.
- Say "SK" or "Stop Keying" before you hang up.



How to Make a Voice to TTY Phone Call:

- 1. Dial the voice relay number.
- You will hear, "Nebraska Relay operator [number]. May I have the number you are calling, please?"
- 3. Give the relay operator the area code and telephone number you wish to call and any further instructions.
- 4. The relay operator will process your call, relaying exactly what the TTY user is typing. The Relay operator will relay exactly what you say back to the TTY user.
- **5.** Say the letters SK or say "stop keying" and then hang up.



Tele**Braille**

Deafblind relay users often use TTYs equipped with TeleBraille. Specially trained relay operators are familiar with deafblind users and trained to provide effective solutions to their calling needs.

Text Pacing:

This feature is specific to TeleBraille users. During the calls, the relay operator will type at a regular pace. The message comes across on the user's TeleBraille at a rate of 15 words per minute. This allows the user to achieve a more readable rhythm. It is set at this default wordsper-minute rate unless the deafblind

7 • 1 • 1

800 • 833 • 7352

nebraskarelay.com/telebraille

user requests increased or decreased rates of text in increments of five words per minute.

How to Make a TeleBraille Phone Call:



Deafblind user types the conversation to relay operator. Relay operator voices the typed message to voice user.



Relay operator types the voice user's conversation to Deafblind user. Deafblind user "reads" the conversation through a TeleBraille device.

Spanish Relay

Nebraska Relay also provides the service in Spanish. TTY users can type in Spanish and the conversations will be relayed in Spanish or English. TTY users can also request Spanish-to-English or English-toSpanish translation. To make a Spanish relay call, dial the Nebraska Relay number and instruct the relay operator how you want your call translated.

7 •1•1
888•272•5528
(Spanish to Spanish)
877•564•3503
(Spanish to English)
nebraskarelay.com/spanish

How to Make a Spanish Relay Call:



Relay operator voices TTY user's typed message in Spanish to voice user.



Relay operator relays voice user's spoken words in Spanish by typing them back to TTY user.

Talk With Ease

Speech-to-Speech

Speech-to-Speech (STS) allows a person with a speech disability to voice his/her comments. A specially trained Nebraska Relay operator will listen and repeat the

speech-disabled user's comments to the called party. You do not need special equipment to use this service.

7 • 1 • 1

888 • 272 • 5527

877•787•1989 (Customer Service)

nebraskarelay.com/sts

How to Make an STS Phone Call:



STS user talks to voice user.



Relay operator re-voices STS user's conversation to voice user.





Voice user talks directly back to STS user.

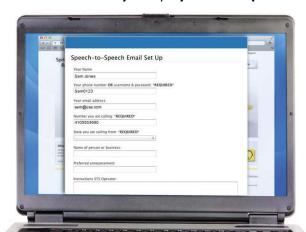
My Email Set Up My Wireless *STS

This new feature makes call set-up easy for anyone with a speech disability.

In making the call set-up more efficient, Nebraska Relay now offers **My Email Set Up**. Now, an

STS user can e-mail call instructions or information 2 to 24 hours prior to the call. This can include information such as the number to be dialed, the name of the person being called, any special instructions to help make the call easier.

For more information about My Email Set Up, go to www.nebraskarelay.com/myemailsetup





A new national wireless solution for STS users.

While 711 has been implemented across the nation, it's often difficult or time consuming to reach STS when not at home. Sprint has implemented a

national wireless short code for STS to make it easier to

place or receive STS calls. Simply dial *787 (*STS) from any Sprint wireless phone to be connected with a Sprint STS relay operator.

Please note that this service is only available on the Sprint wireless network at this time.

For more information about My Wireless STS, contact STS Customer Support at 877-787-1989 or visit

www.sprintsts.com/mywireless



isten With Clarity

<u> Hearing Carry-Over</u>

Hearing Carry-Over (HCO) allows speech-disabled users with hearing to listen to the person they are calling. The

HCO user types the conversation for the relay operator to voice to the standard telephone user.

7 • 1 • 1

800 • 833 • 7352

nebraskarelay.com/hco

How to Make an HCO Phone Call:



HCO user types the conversation to relay operator.



Relay operator voices VCO user's typed message to voice user.

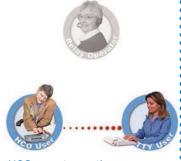




Voice user talks directly to HCO user.

H**CO** to TTY

HCO users can listen while the relay operator is voicing the TTY user's typed message. The HCO user types the conversation directly to the TTY user.



HCO user types the message directly to TTY user.



TTY user types the message to the relay operator.



Relay operator voices TTY user's typed message to HCO user.

HCO to HCO

HCO users can contact other HCO users. The relay operator will voice to both parties what is typed on each user's TTY.



HCO user #1 types the conversation to relay operator. Relay operator vortice typed message by HCO user #1 to HCO user #2.



HCO user #2 types the conversation to HCO user #1. Relay operator voices the typed message by HCO user #2 to HCO user #1.

alk With Confidence

Voice Carry-Over

Voice Carry-Over (VCO) is a service that enables a hard-of-hearing or deaf user to speak directly to the hearing person.

When a hearing person speaks to the VCO user, the relay operator will serve as his/her "ears" and type everything said that will appear on a TTY or text display equipment.

7 • 1 • 1

877 • 564 • 2481

nebraskarelay.com/vco

How to Make a VCO Phone Call:





VCO user talks to voice user directly.



After VCO user says, "Go Ahead", it is voice user's turn to respond.

Voice user talks to VCO user while the relay operator types voice user's message.

4

VCO user reads the message on the TTY or text display equipment.









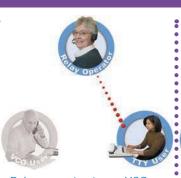
The relay operator specializes in all types of Voice Carry-Over calls, such as VCO Direct, VCO to TTY, VCO to VCO, or Two-Line VCO. With this service, you no longer have to specify your call type to the operator.

VCO to TTY

The relay operator will type what the Voice Carry-Over user says to the TTY User. The message that the TTY user types will go directly to the VCO user's TTY or text display equipment.



VCO user talks to TTY user via relay operator.



Relay operator types VCO user's conversation to TTY user. TTY user reads the message on the TTY screen.



TTY user types messages to VCO user's TTY or text display equipment.

VCO to **VCO**

The relay operator will serve as both Voice Carry-Over users' "ears" and type what the other person says. This is for people who have a VCO phone without a text display equipment or don't wish to type.



VCO user #1 talks to VCO user #2. Relay operator types VCO user #1's conversation to VCO user #2.



VCO user #2 reads the message on the TTY screen or text display equipment.



VCO user #2 talks to VCO user #1. Relay operator types conversation back to VCO user #1.

Two-Line Voice Carry-Over

Two-line VCO allows a deaf or hard-of-hearing person with two telephone lines to use one line for speaking directly to a hearing person while the second line is used to receive the hearing person's typed responses.

How to Make a Two-Line VCO Phone Call:

- 1. Dial the Nebraska Relay number on line #1 and type, "TWO LINE VCO PLS CALL ME BACK ON (provide VCO user's telephone number on line #2)".
- 2. The relay operator will call VCO user back on line #2. Pick up the line #2 phone and then press the flash button or switch-hook to obtain a second dial tone.
- 3. Dial voice user's number.
- Press the flash button or switch-hook to reconnect the operator to being VCO user's conversation.



5. While the 1st phone line is connected to relay operator, VCO user speaks directly to voice user on the 2nd phone line.

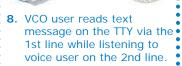


6. Voice user talks to VCO user.



7. Relay operator types voice user's message to VCO user.





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Read, Listen, and Talk

CapTel®

CapTel users place a call in the same way they would when using a traditional phone by dialing the number directly. The CapTel phone automatically connects to Nebraska's captioning relay service as you dial on a one or two-line phone.

When the other person speaks, you can hear his/her voice and also read the spoken comments on your CapTel phone display screen.

CapTel is an acronym for captioned telephone.

For CapTel Callers: Dial the person you are calling directly
For Hearing Callers:
877•243•2823

nebraskarelay.com/captel

How to Make a CapTel Phone Call:





As CapTel user dials, the phone automatically connects to a captioning service. CapTel user talks directly to voice user.

Voice user talks to CapTel user.

CapTel operator captions/transcribes voice user's message into text by using voice-recognition technology.



CapTel user listens and reads voice user's conversation on the CapTel phone.



NOTE: CapTel users are responsible for their own long-distance charges.

However, there is no charge for using the CapTel service.

To purchase a CapTel, go to weapercaptel.com/availability/NE.php

TTY Payphone

The Federal Communications Commission (FCC) issued an order of access to relay services through public payphones.

The order states that:

- All local calls from TTY payphones are free of charge.
- Toll calls can be billed through calling cards and prepaid cards.

TTY users who wish to use a coin TTY payphone can use Nebraska Relay to assist in connecting calls. There are several ways to bill non-local calls:

- Collect
- Third party
- · Calling card
- Prepaid card

7 • 1 • 1

800 • 833 • 7352

Answering Machine Retrieval

The TTY user can request the relay operator to **retrieve voice messages** from the answering machine.

Nebraska Relay **DOES NOT** enter a "CALL TO" number.

- Place your phone handset on the speaker part of the answering machine until all messages have been retrieved.
- Place the phone handset back on the TTY and type "GA."
- Relay operator will type your messages.

7 • 1 • 1

800 • 833 • 7352

900 Services

Nebraska Relay provides a **toll-free 900 number** that connects relay callers to any 900 or 800 Pay-Per-Call service.

NOTE:

The caller is responsible for direct billing.

How to Make 900 Phone Call:

- Relay users dial a separate tollfree 900 number to connect with Nebraska Relay.
- Relay operator will dial the requested outbound 900 or 800 Pay-Per-Call service number.
- **3.** Upon connection to the 900 number, billing procedures will begin.

900 • 230 • 3434

NOTE:

Billing procedures may apply differently depending upon the payper-call service called.

For further assistance with 900 calls, call Nebraska Relay 24-hour Customer Service at 800-676-3777 (TTY/Voice)

Directory Assistance

Nebraska Relay will relay **Directory Assistance (DA)** calls between TTY
users and the Local Exchange Carrier
(LEC) DA operator. Once the caller
makes the request, the relay operator

will contact the appropriate LEC DA operator. After obtaining the number, the caller may choose to place the call through Nebraska Relay or dial directly from TTY to TTY.

International Calls

Nebraska Relay allows you to place and receive calls to and from **anywhere in the world** (using English or Spanish).

Callers from a country outside the United States may also access Sprint Relay via 605-224-1837 Page 104

605 • 224 • 1837



Computer users can access Nebraska Relay directly. **ASCII Split Screen** is designed to allow high-speed ASCII computer users and relay operators to type their conversations which can be viewed on split windows. ASCII users and voice users can interrupt the relay operator if needed.

If your computer has 1200 Baud or up, use these settings:

- 8 Bits
- No Parity
- 1 Stop Bit
- Full Duplex

If your computer has 300 Baud or below, use these setting:

- 8 Bits
- No Parity
- 1 Stop Bit
- Half Duplex

7 • 1 • 1

1.800.833.7352

1.888.696.0629 (Fast ASCII)



Telecommunications Equipment Program

Nebraska Specialized
Telecommunications Equipment
Program (NSTEP) is a program
that provides free equipment for
Nebraska residents with qualifying
disabilities that interfere with the use
of the telephone. Individuals who are
experiencing difficulty using their current
telephone equipment are encouraged
to apply to receive assistive equipment
through the Nebraska Specialized
Telecommunications Equipment Program.

www.nebraskarelay.com/nstep

What Type of Equipment is Available?

The program provides a range of assistive telephone equipment, including:

- amplified telephones
- TTYs
- captioned telephones
- videophones
- wireless call phones
- alerting devices



Who is Eligible for the Program?

Nebraska residents who have phone service in their home and a certified disability that causes difficulty using a standard telephone are qualified.

Training and equipment installation is provided at no charge.

To find out whether you are eligible or for more information, go to www.psc.state.ne.us/home/NPSC/equipment/equip.html



	TTY Users	7-1-1 800-833-7352 For more information: www.nebraskarelay.com/tty
	Hearing Users	7-1-1 800-833-0920 For more information: www.nebraskarelay.com/voice
	TeleBraille Relay	7-1-1 800-833-7352 For more information: www.nebraskarelay.com/telebraille
	Spanish Relay	7-1-1 888-272-5528 (Spanish-to-Spanish) 877-564-3503 (Spanish-to-English) For more information: www.nebraskarelay.com/spanish
	Voice Carry-Over (VCO)	7-1-1 877-564-2481 866-931-9027 (Customer Service for VCO only) For more information: www.nebraskarelay.com/vco
	Hearing Carry-Over (HCO)	7-1-1 800-833-7352 For more information: www.nebraskarelay.com/hco
	Speech-to-Speech (STS)	7-1-1 888-272-5527 877-787-1989 (Customer Service for STS only) For more information: www.nebraskarelay.com/sts
	Internet Relay	www.sprintip.com For more information: www.nebraskarelay.com/iprelay
	CapTel®	For CapTel Caller: Dial the person you are calling directly For Hearing Callers: 877-243-2823 For more information: www.nebraskarelay.com/captel
MANUSCONIA.	WebCapTeI®	For WebCapTel Caller: Login at www.sprintcaptel.com For Hearing Callers: 800-933-7219 For more information: www.nebraskarelay.com/webcaptel
	900 Services	900-230-3434 For more information: www.nebraskarelay.com/900
	Nebraska Relay Customer Service	800-676-3777 (TTY/Voice/ASCII) 800-676-4290 (Español - TTY/Voz/ASCII) Sprint.TRSCustServ@sprint.com (E-mail)



For more information: www.nebraskarelay.com



About | Traditional Relay | Captioned Telephone | Spanish Relay | Internet Relay | Distribution Program | Contact Us



NEW PHONE CapTel 2400i BUY NOW!

NEW SERVICE -Speech-to-Speech Email Set Up Click here to learn more



Job Opportunity: Outreach Specialist

Nebraska Relay offers **FREE** services that provide full telephone access to people with a hearing loss or speech disability.





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click here to pause



Nebraska Relay Videos



Sponsorship Request



Nebraska Relay Flyer



Information for Hearing Callers



Information for Hard-of-Hearing



Nebraska Relay Customer Profile



Service Feedback



FAQs



Sprint Relay Store



About | Traditional Relay | Captioned Telephone | Spanish Relay | Internet Relay | Distribution Program | Contact Us



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click here to pause



Nebraska Relay Videos



Sponsorship Request



Nebraska Relay Flyer



Information for Hearing Callers



Information for Hard-of-Hearing



Nebraska Relay Customer Profile



Service Feedback



FAQs



Sprint Relay Store

Nebraska Relay Proudly Sponsors the NAD Leadership Training Conference!









Nebraska Relay is proud to provide communication access to all Nebraska residents and visitors.

Check out at our website: www.nebraskarelay.com

Nebraska Relay Service is provided by Sprint Relay

86-301. Act, how cited.

Sections <u>86-301</u> to <u>86-315</u> shall be known and may be cited as the Telecommunications Relay System Act.

Source: Laws 1993, LB 305, § 23; R.S.1943, (1999), § 86-1301; Laws 2002, LB 1105, § 179.

86-302. Purpose of act.

The purpose of the Telecommunications Relay System Act is to provide a statewide telecommunications relay system and a statewide voucher program for the provision of specialized telecommunications equipment for qualified deaf, hard of hearing, or speech-impaired persons in Nebraska which enables them to communicate twenty-four hours per day, seven days per week, with other persons who use conventional telephone systems.

Source:Laws 1990, LB 240, § 1; R.S.Supp.,1992, § 86-901; Laws 1993, LB 305, § 24; Laws 1995, LB 146, § 1; Laws 1997, LB 568, § 1; Laws 1999, LB 359, § 4; R.S.1943, (1999), § 86-1302; Laws 2002, LB 1105, § 180.

86-303. Definitions, where found.

For purposes of the Telecommunications Relay System Act, the definitions found in sections 86-304 to 86-311 apply.

Source:Laws 1990, LB 240, § 2; R.S.Supp.,1992, § 86-902; Laws 1993, LB 305, § 25; Laws 1995, LB 146, § 2; Laws 1999, LB 359, § 5; R.S.1943, (1999), § 86-1303; Laws 2002, LB 1105, § 181.

86-304. Commission, defined.

Commission means the Public Service Commission.

Source:Laws 2002, LB 1105, § 182.

86-305. Deaf, defined.

Deaf has the same meaning as in section 71-4720.01.

Source: Laws 2002, LB 1105, § 183.

86-306. Fund, defined.

Fund means the Nebraska Telecommunications Relay System Fund.

Source: Laws 2002, LB 1105, § 184.

86-307. Hard of hearing, defined.

Hard of hearing has the same meaning as in section <u>71-4720.01</u>.

Source: Laws 2002, LB 1105, § 185.

86-308. Household, defined.

Household means a family unit whose members are related by birth, marriage, or adoption and who share a common living arrangement.

Source:Laws 2002, LB 1105, § 186.

86-309. Personal telephone service, defined.

Personal telephone service means telephone service located in an individual's room and the telephone service account is in the individual's name.

Source:Laws 2002, LB 1105, § 187.

86-310. Specialized telecommunications equipment, defined.

Specialized telecommunications equipment means any telecommunications device enabling deaf, hard of hearing, or speech-impaired persons to communicate using conventional telephone systems. Specialized telecommunications equipment includes, but is not limited to, telecommunications devices for the deaf, signaling devices, and amplification devices.

Source: Laws 2002, LB 1105, § 188.

86-311. Telecommunications relay system, defined.

Telecommunications relay system means a service permitting full and simultaneous communication between deaf, hard of hearing, or speech-impaired persons using specialized telecommunications equipment and other persons using conventional telephone equipment.

Source: Laws 2002, LB 1105, § 189.

86-312. Nebraska Telecommunications Relay System Fund; created; use; investment.

- (1) The Nebraska Telecommunications Relay System Fund is created. The fund shall be used to provide a statewide telecommunications relay system and to administer a statewide voucher program to provide specialized telecommunications equipment to qualified deaf, hard of hearing, and speech-impaired persons in Nebraska, except that transfers may be made from the fund to the General Fund at the direction of the Legislature.
- (2) Based upon the price of the equipment, vouchers shall be issued by the program administrator to pay private vendors for all or part of the cost of the equipment. After purchase, the recipient is the owner of the equipment and responsible for enforcement of any warranties and repairs.
- (3) Any money in the Nebraska Telecommunications Relay System Fund available for investment shall be invested by the state investment officer pursuant to the Nebraska Capital Expansion Act and the Nebraska State Funds Investment Act.

Source:Laws 1990, LB 240, § 3; R.S.Supp.,1992, § 86-903; Laws 1993, LB 305, § 26; Laws 1994, LB 1066, § 141; Laws 1995, LB 146, § 3; Laws 1997, LB 568, § 2; Laws 1999, LB 359, § 6; R.S.1943, (1999), § 86-1304; Laws 2002, LB 1105, § 190; Laws 2009, First Spec. Sess., LB3, § 97.

Cross References

Nebraska Capital Expansion Act, see section 72-1269. Nebraska State Funds Investment Act, see section 72-1260.

86-313. Surcharge; amount; hearing; commission; powers and duties.

- (1)(a) Each telephone company in Nebraska shall collect from each of the telephone subscribers a surcharge not to exceed twenty cents per month on each telephone number or functional equivalent in Nebraska, including wireless service as defined in section 86-456.01. Except for wireless service, the surcharge shall only be collected on the first one hundred telephone numbers or functional equivalents per subscriber. The companies shall add the surcharge to each subscriber's bill. The surcharge shall not be collected with respect to prepaid wireless telecommunications service as defined in the Prepaid Wireless Surcharge Act.
- (b) The telephone companies are not liable for any surcharge not paid by a subscriber.
- (2) Before April 1 of each year, the commission shall hold a public hearing to determine the amount of surcharge necessary to carry out the Telecommunications Relay System Act. After the hearing, the commission shall set the surcharge at the level necessary to fund the statewide telecommunications relay system and the specialized telecommunications equipment program for the following year plus a reasonable reserve. The surcharge shall become effective on July 1 following the change.
- (3) In an emergency the commission may adjust the amount of the surcharge to become effective before such date but only after a public hearing for such purpose.
- (4) Each telephone company shall remit the proceeds from the surcharge to the commission. The commission shall remit the funds to the State Treasurer for credit to the fund.
- (5) The commission may require an audit of any company collecting the surcharge pursuant to the act.
- (6) This section shall not apply to subscribers who have no access to relay service.

Source:Laws 1990, LB 240, § 4; R.S.Supp.,1992, § 86-904; Laws 1993, LB 305, § 27; Laws 1995, LB 146, § 4; R.S.1943, (1999), § 86-1305; Laws 2002, LB 1105, § 191; Laws 2003, LB 187, § 28; Laws 2007, LB661, § 3; Laws 2010, LB723, § 1; Laws 2012, LB1091, § 6. Operative Date: January 1, 2013

Prepaid Wireless Surcharge Act, see section <u>86-901</u>.

86-314. Telecommunications relay system; specialized telecommunications equipment program; requirements; rules and regulations; administrative fine.

- (1) The commission shall establish standards, procedures, and training specifications for the telecommunications relay system and shall supervise its operation. The telecommunications relay system shall assure prompt and accurate relay of all messages seven days per week, twenty-four hours per day, including holidays, to all deaf, hard of hearing, or speech-impaired persons living in Nebraska who possess specialized telecommunications equipment. Any person using the telecommunications relay system shall not be charged for access to such system other than charges billed for instate and out-of-state long-distance telephone service. The telecommunications relay system shall at least provide the following telephone services: (a) Statewide instate calls with charges for long-distance calls billed to the person making the call in a manner which the commission determines will recover the cost of long-distance calls to the system; (b) out-of-state calls with charges billed to the person making the call; and (c) emergency calls.
- (2) The commission shall establish standards and criteria and shall determine the eligibility of qualified deaf, hard of hearing, and speech-impaired persons applying for specialized telecommunications equipment. The eligible standards and criteria shall include the following: (a) Only one person per household may be a recipient of the telecommunications equipment; (b) an applicant shall reside in a household that has telephone service; (c) a recipient of equipment may not reapply for assistance more than once every five years; and (d) a nursing home or institution resident is eligible for specialized telecommunications equipment only if he or she has personal telephone service.
- (3) The commission may approve applications for specialized telecommunications equipment if they meet the guidelines established by the commission.
- (4) The commission shall adopt and promulgate rules and regulations necessary for implementation of the Telecommunications Relay System Act and guidelines for the specialized telecommunications equipment program. The commission may enter into contracts with other agencies or private organizations, which may include the Commission for the Deaf and Hard of Hearing, to operate the

telecommunications relay system and the specialized telecommunications equipment program.

(5) The Public Service Commission may administratively fine pursuant to section 75-156 any person who violates the act.

Source:Laws 1990, LB 240, § 5; R.S.Supp.,1992, § 86-905; Laws 1993, LB 305, § 28; Laws 1995, LB 146, § 5; Laws 1997, LB 851, § 27; Laws 1999, LB 359, § 7; Laws 2000, LB 1285, § 22; R.S.Supp.,2000, § 86-1306; Laws 2002, LB 1105, § 192.

86-315. Special committee; membership.

The commission shall administer the Telecommunications Relay System Act with the advice of a special committee appointed by the Commission for the Deaf and Hard of Hearing. The special committee shall consist of seven members as follows: One member shall be a deaf person; one member shall be a deaf or hard of hearing person; one member shall be a speech-impaired person; one member shall represent the Public Service Commission; one member shall represent the telephone industry; one member shall represent the Commission for the Deaf and Hard of Hearing; and one member shall represent the public.

Source:Laws 1990, LB 240, § 6; R.S.Supp.,1992, § 86-906; Laws 1993, LB 305, § 29; Laws 1997, LB 851, § 28; Laws 1999, LB 359, § 8; R.S.1943, (1999), § 86-1307; Laws 2002, LB 1105, § 193.

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010 NEBRASKA TELECOMMUNICATIONS RELAY SYSTEM:

- 010.01 Purpose: Provide a statewide telecommunications relay system and a statewide voucher program for the provision of specialized telecommunications equipment for qualified deaf, hard of hearing, or speech-impaired persons in Nebraska which enables them to communicate twenty-four (24) hours per day, seven (7) days per week, including holidays, with other persons who use conventional telephone systems.
- 010.02 Statutory Authority: This section is adopted pursuant to the Telecommunications Relay System Act.
- 010.03 Scope: Any person using NTRS shall not be charged for access to such system other than charges billed for in-state and out-of-state long-distance telephone service. NTRS shall at a minimum provide statewide in-state calls with charges for long-distance calls billed to the person making the call in a manner which the Commission determines will recover the cost of long-distance calls to the system; out-of-state calls with charges billed to the person making the call; and emergency calls.
- 010.04 Commission Authority: Procedures involving the administration of NTRS shall be governed by the Nebraska Telecommunications Relay System Rules and the Rules of Commission Procedure unless otherwise prescribed by order of the Commission. The Commission may enter into contracts with other agencies or private organizations to operate NTRS and NSTEP.
 - 010.04A Administrative Fines: The Commission may administratively fine pursuant to Neb. Rev. Stat. Section 75-156 any person who violates the Act.
- <u>010.05</u> Forms: The Commission will specify, by order, the manner in which information shall be filed with the Commission. Upon a showing of good cause, the Program Administrator may accept information filed in a manner other than prescribed in a Commission order.
- 010.06 Telecommunications Relay Surcharge: Each telephone company and provider of wireless service in Nebraska shall collect from each of the telephone subscribers with a surcharge not to exceed twenty (20) cents per month on each telephone number or functional equivalent in Nebraska, including wireless service.

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EFFECTIVE DATE: September 2, 2013

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010.06A Exemption: The surcharge authorized by this section shall not apply to prepaid wireless telecommunications services as defined in the Prepaid Wireless Surcharge Act.

010.06B Relay Surcharge Shown on Subscriber Bills: The surcharge shall appear as a separate line-item charge on the subscriber's billing statement and shall be labeled as "Telecomm Relay Surcharge" or "Relay Surcharge".

010.06C Annual Surcharge Rate Determination:

010.06C1 Public Hearing: Before April 1 of each year the Commission shall hold a public hearing to determine the amount of surcharge necessary to carry out the provisions of the Act.

010.06C2 Rate: After such hearing as required in Section 010.06B1, the Commission shall set the surcharge at the level necessary to fund the statewide NTRS and NSTEP for the following year plus a reasonable reserve.

010.06C3 Effective Dates: The surcharge set pursuant to 010.06B1 and 010.06B2 shall become effective for the next fiscal year beginning July 1.

olo.06C4 Limitation: The surcharge rate shall not exceed twenty cents (0.20) per month on each telephone number or functional equivalent in Nebraska, including wireless service. Except for wireless service, the surcharge shall only be collected on the first one hundred (100) telephone numbers or functional equivalent per subscriber. The companies shall add the surcharge to each subscriber's local telephone bill.

010.06C5 Emergency Rate Setting: In an emergency the Commission may adjust the amount of the surcharge after a public hearing for such purpose.

010.06D Nebraska Telecommunications Relay System Fund: The fund shall consist of the surcharges credited to the fund, any monies appropriated by the Legislature, any federal funds received for telecommunications relay systems, and any other funds designated for credit to the fund.

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010.07 Remittance:

 $\underline{010.07A}$ Remittance Worksheets: Remittance worksheets shall be received by the Department no later than thirty (30) days after the end of the remittance period. In the event the thirtieth (30th) day falls on a weekend or holiday, the remittance form shall be due on the next business day.

010.07B Filing Options:

010.07B1 Monthly: Telephone companies and providers of wireless service shall remit the TRS surcharge on a monthly basis to the TRS Fund except as provided in sections 010.07B2 and 010.07B3.

010.07B2 Quarterly: A telephone company or provider of wireless service whose monthly remittance amount is less than twenty-five dollars (\$25) may elect to remit on a quarterly basis.

010.07B3 Annually: A telephone company or provider of wireless service whose monthly remittance amount is less than twenty-five dollars (\$25) may elect to remit on an annual basis. The period for annual remittances shall run July 1 through June 30, with the surcharge remittance due on July 30 annually.

010.07B4 Filing Election: A telephone company or provider of wireless service whose monthly remittance amount is less than twenty-five dollars (\$25) must notify the Commission in writing of its election to remit quarterly or annually prior to the remittance period.

010.07C Remittance to the Fund: Except as provided in Rule 010.07C1, all remittances shall be transferred electronically to the Nebraska State Treasurer. Remittances shall be received by the Nebraska State Treasurer no later than thirty (30) days after the end of the remittance period in which they were collected pursuant to the period prescribed or elected pursuant to section 010.07B, as applicable. In the event the thirtieth (30th) day falls on a weekend or holiday, the electronic remittance shall be due on the next business day.

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010.07Cl Department Initiated Remittances: A telephone company or provider of wireless service may elect to have the Department initiate the electronic transfer of such company's remittance to the Fund.

010.07C2 Authorization and Banking Information: A telephone company or provider of wireless service electing to have the Department initiate the electronic transfer of remittance to the Fund shall provide the necessary authorization and banking information required by the Program Administrator.

Olo.07C3 Initiation of Transfer: The receipt of a telephone company or provider of wireless services' remittance worksheet will result in the Department's initiation of the electronic transfer of the telephone company's or provider of wireless services' remittance to the Fund if the appropriate indication is made on said remittance worksheet. Said electronic transfer will be done in accordance with authorization granted to the Department by the company or provider of wireless services.

<u>010.07D</u> Remittance by Commission: The Commission shall remit the proceeds from the surcharge to the State Treasurer for credit to the Fund.

010.07E Audits: The Commission may require an audit of any telephone company collecting the surcharge pursuant to the Act.

010.08 Adequacy of Service:

010.08A The vendor shall ensure that, except during network failure, at least ninety percent (90%) of all calls are answered by the relay center within ten (10) seconds from the time the call enters the TRS system during all times of the day and at least ninety-five percent (95%) of all calls are answered within ten (10) seconds for the month by any method which results in the caller's call immediately being placed, not put in a queue or on hold.

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010.09 Directory Requirements: Telephone companies shall provide printed information in telephone directories at no charge regarding relay services.

010.09A Required Information: The information listed in telephone directories shall contain information on the following:

010.09A1 Connecting to the relay, including a reference to 711 dialing;

010.09A2 Access numbers, including but not limited to TTY, Voice, ASCII, Fast ASCII, Speech to Speech, Spanish and Customer Service;

010.09A3 A reference to the NSTEP program including contact numbers for the PSC and the Nebraska Commission for the Deaf and Hard of Hearing and application information.

 ${\color{red}010.10}$ Notification: Telephone companies shall inform their subscribers of the availability of relay services through a bill insert or other prominent bill message on an annual basis.

010.11 Nebraska Specialized Telecommunications Equipment Program (NSTEP):

010.11A Eligibility: To qualify for NSTEP applicants must meet
ALL of the following eligibility requirements:

010.11A1 Applicant is deaf, hard of hearing, speechimpaired, or dual-disabled and as a result of such impairment is unable to use a conventional telephone effectively.

<u>010.11A2</u> Applicant is at least three (3) years of age or older and able to demonstrate the requisite skill to operate STE.

 $\underline{010.11A3}$ Applicant currently has telephone service or has applied for telephone service in the state of Nebraska at their primary place of residence.

010.11A4 Applicant is a resident of the state of

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Nebraska.

010.11A5 Applicant has not applied for NSTEP within the past five (5) years.

010.11A6 At the time of application, no other resident of applicant's household has STE in his or her possession.

<u>010.11A7</u> Applicant has obtained a professional certification of the qualifying disability or disabilities as prescribed by the Commission.

010.11B Equipment Selection: Except as provided in Section 010.11C, applicants may only choose one piece of STE and/or one telephone signaling device per household. A list of eligible equipment categories may be obtained from the Commission upon request.

Olo.11C Dual-Disabled Applicants: Dual-Disabled applicants desiring specialized equipment with further adaptive equipment for dually-disabled individuals shall complete a supplemental application form including certification from a qualified profession of applicant's dual-disability status and need for further adaptive equipment. Supplemental applications shall be available from the Commission upon request.

010.11D Voucher Procedure:

Olo.11D1 Once the Program Administrator receives a completed application form and verifies that all eligibility requirements have been met, the Program Administrator will issue a NSTEP voucher.
Olo.11D2 Applicant, or in the case of a minor, applicant's parent or guardian, shall sign the NSTEP voucher on line marked "Applicant's Verification."

 $\underline{010.11D3}$ Applicant shall deliver the signed voucher to the vendor from whom the applicant is purchasing the STE.

010.11E Reapplying: Reapplication for NSTEP is allowed only when one of the following requirements is satisfied.

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010.11E1 Applicant has not received any STE in the five years previous to the date on the current application.

olo.11E2 Applicant's medical condition has changed to such an extent that different equipment is required. Special approval is required to reapply under this section from the Nebraska Commission for the Deaf and Hard of Hearing.

010.11E3 The Commission or Program Administrator may waive the requirements of section 010.11E1 upon a showing of need by the applicant or upon request from the Nebraska Commission for the Deaf and Hard of Hearing.

010.11F Vendors:

010.11F1 Participating Vendors: Only vendors recognized by the Commission as "Participating Vendors" will be eligible for reimbursement under NSTEP.

Olo.11F2 Application Process: Any Vendor desiring to be recognized as a Participating Vendor in NSTEP shall submit the following: a completed application form; a return and exchange policy statement; a price list; and a statement that the vendor has read and agrees to adhere to the Commission's Rules and Regulations governing NSTEP. Participating Vendor application forms shall be available from the Commission upon request.

010.11F3 Approved Equipment List: The Commission shall maintain an approved equipment list that will be made available upon request. Vendor invoices submitted for payment of equipment not on the approved equipment list will not qualify for reimbursement.

010.11F4 Payment Authorization: Except as provided in Section 010.11F8, payment for equipment submitted under NSTEP shall be subject to the maximum allowable expense per applicant as determined by the Commission. Any costs incurred by the applicant in excess of the maxi-

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mum allowable expense per applicant are the responsibility of the applicant. Setup costs shall not be included in the calculation of the maximum allowable expense per applicant.

- 010.11F5 Product Knowledge: Vendors shall maintain reasonable knowledge of all products being offered that qualify for reimbursement under NSTEP.
- 010.11F6 Vendor Payment: To receive payment under NSTEP, vendors shall submit voucher forms received from applicants along with an itemized invoice of applicant's purchase(s) to the Commission.
- olo.11F7 Setup Costs: If the applicant requests setup services from the vendor, the vendor may request reimbursement for the actual setup costs from NSTEP. The vendor may submit the actual costs of setup to the Commission on the same invoice as the equipment sale.
- 010.11F8 Special Authorization: If the applicant is determined to be dually-disabled, the maximum allowable expense per applicant pursuant to Section 010.11F4 does not apply.

010.11G Applicant Responsibilities:

- 010.11G1 Maintenance: Any costs for general and regular servicing or maintenance of equipment purchased under NSTEP is the responsibility of the applicant.
- Olo.11G2 Repairs: Any costs for repair of equipment purchased under NSTEP, regardless of whether said equipment is under warranty, is the responsibility of the applicant.
- Olo.11G3 Warranties, Extended Warranties: Any costs associated with warranty provisions for repairs of any equipment purchased under NSTEP is the responsibility of the applicant. Any costs associated with purchasing warranties and/or extended warranties on equipment purchased under NSTEP are the responsibility of the applicant.

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010.11G4 Structural Modifications: Any costs associated with structural modifications of existing structures necessary for NSTEP equipment operation is the responsibility of the applicant.

010.12 Telecommunications Relay System Advisory Committee: The Commission shall solicit advice on the administration of NTRS from the Telecommunications Relay System Advisory Committee. Such Committee shall be formed pursuant to the Act.



Sprint12502 Sunrise Valley Drive
Reston, VA 20196
Office: (703) 433-8581 Fax: (866) 515-0932

Michaela Clairmonte, CPCM Manager Contract Negotiations & Management

May 2, 2014

Stephen Meradith, Buyer State of Nebraska, Nebraska Public Service Commission 1200 N Street, Suite 300 Lincoln, NE 68508

Re: Contract Number 60388 O4 - Telecommunication Relay Services

Dear Mr. Meradith,

Please find enclosed two signed originals of the Amendment 1 to the Contract Number 60388 O4 for Telecommunication Relay Services between the State of Nebraska, Nebraska Public Service Commission and Sprint Communications Company, L.P. Please have the Amendment counter signed and return one original to my attention at the address noted below.

Sprint

Attn: Michaela Clairmonte 12502 Sunrise Valley Drive MS: VARESA0208-2D351

Reston, VA 20196

Should you have any questions or concerns regarding this matter, please do not hesitate to contact me at 703-433-8581.

Sincerely,

Michaela Clairmonte, CPCM

Manager, Contracts Negotiations & Management

Sprint

CONTRACT AMENDMENT 1

CONTRACT 60388(O4)

The Parties to Contract 60388(O4), which contract has resulted from RFP 72617(O3), hereby amend the Contract by incorporating in the RFP document the following mutually agreed-upon clarifications and amendments:

- 1. **SECTION III.Y(2) EARLY TERMINATION** shall be amended to read as follows:
 - 2. The State, in its sole discretion, may terminate the contract for convenience upon 30 days written notice to the contractor. Such termination shall not relieve the contractor of warranty or other service obligations incurred under the terms of the contract. In the event of cancellation the contractor shall be entitled to payment, determined on a pro rata basis, for products or services satisfactorily performed or provided.
- 2. Section III.AA BREACH BY CONTRACTOR shall be amended to read as follows:

The State may terminate the contract, in whole or in part, if the contractor fails to perform its obligations under the contract in a timely and proper manner. The State shall, by providing a written notice of default to the contractor, allow the contractor to cure a failure or breach of contract within a period of thirty (30) days (or longer at State's discretion considering the gravity and nature of the default). Said notice shall be delivered by Certified Mail, Return Receipt Requested or in person with proof of delivery. In case of default of the Contractor which is not cured within 30 days (or such longer period as granted by the State, if applicable) of Contractor's receipt of notice, the State may Contract the service from other sources and hold the Contractor responsible for any excess cost occasioned thereby.

Section III.CC PENALTY shall be amended to read as follows:

In the event that the contractor fails to perform any substantial obligation under the contract, the State may withhold all monies due and payable to the contractor, without penalty, until such failure is cured or otherwise adjudicated. Failure to meet the dates stipulated in the contract for the deliverables may result in an assessment of penalty due the State of \$2,000.00 dollars per day, until the deliverables are approved. Contractor will be notified in writing when penalty will commence.

The NPSC, at its sole discretion, may require payment from the contractor for failure to meet minimum service level requirements for the provision of TRS according to the following:

1. (a) Failure to meet ninety percent (90%) of all non-CapTel calls answered within ten (10) seconds; measured daily – Penalty \$250.00 per day;

- (b) Failure to meet eighty-five (85%) of CapTel calls answered within ten (10) seconds; measured daily Penalty \$250.00 per day;
- 2. (a) Failure to meet ninety-five percent (95%) of all non-CapTel calls answered within ten (10) seconds; measured monthly Penalty \$600.00 per month;
 - (b) Failure to meet eighty-five (85%) of CapTel calls answered within ten (10) seconds; measured monthly Penalty \$600.00 per month;

4. **III.EE FORCE MAJEURE** shall be amended to read as follows:

Neither party shall be liable for any costs or damages resulting from its inability to perform any of its obligations under the contract due to a natural disaster, or other similar event outside the control and not the fault of the affected party ("Force Majeure Event"). A Force Majeure Event shall not constitute a breach of the contract. The party so affected shall immediately give notice to the other party of the Force Majeure Event. The State may grant relief from performance of the contract if the contractor is prevented from performance by a Force Majeure Event. The burden of proof for the need for such relief shall rest upon the contractor. To obtain release based on a Force Majeure Event, the contractor shall file a written request for such relief with the State Purchasing Bureau and the Nebraska Public Service Commission. Labor disputes with the impacted party's own employees will not be considered a Force Majeure Event and will not suspend performance requirements under the contract. Delays or failures to perform caused by Force Majeure events impacting Contractor's subcontractors shall be considered excused delays or failures to perform under this provision provided that Contractor and the applicable subcontractor act diligently to remedy the cause of such delay or failure and provide the authorized State representative with an explanation as to the length and cause of the delay as soon as reasonably possible.

5. III.II AUDIT REQUIREMENTS shall be amended to read as follows:

All contractor books, records and documents relating to work performed or monies received under the contract shall be subject to audit at any reasonable time upon the provision of reasonable notice by the State. These records shall be maintained for a period of five (5) full years from the date of final payment, or until all issues related to an audit, litigation or other action are resolved, whichever is longer. All records shall be maintained in accordance with generally accepted accounting principles.

Upon thirty (30) days prior written notice, Sprint shall make records relating to the contract available to the State at Sprint's business offices during normal business hours for inspection, examination or audit. Further, due to the highly sensitive and proprietary nature of Sprint's records, any third party auditor action on behalf of the State may be required at Sprint's sole discretion to execute Sprint's standard Non-Disclosure Agreement prior to examining, inspecting, copying or auditing Sprint's records.

In addition to, and in no way in limitation of any obligation in the Contract, the Contractor shall agree that it shall return to the State any payment made under the Contract which has been disallowed because of a State audit exception; provided; however, that Contractor shall have the right to appeal such a disallowed payment in accordance with any available remedies at law or equity. The Contractor agrees to correct promptly any Default by Contractor under the Contract reported to the State in the course of an audit.

For Sprint's CapTel subcontractor, CTI, the following audit rights shall apply:

- (i) Captel Subcontractor shall permit any duly authorized agent of Nebraska to visit the CapTel Subcontractor Captel call centers, review only those records set forth in (iii) below, observe demonstrations of Captel calls, review with CapTel Subcontractor management CapTel Subcontractor's customer service practices, security and confidentiality systems subject to reasonable access, identification, security, safety, and all other policies of CapTel Subcontractor. All such activities by the state or its agents shall be performed in a manner that will not unduly interfere with the provision of CapTel Subcontractor's Captel services.
- (ii) Nothing herein shall give the state or its agents the right to review, audit, or otherwise have any access to any information that is, in whole or in part, the property of any other CapTel Subcontractor customer including and other state Captel relay program, any other Sprint, any Captel user, or any of CapTel Subcontractor's or any of its Affiliates' financial, operational, internal or other information, or any other documents, methods, procedures, technical, confidential, proprietary, or trade secret information, or any other information of any kind unless specifically agreed to in writing by CapTel Subcontractor and Sprint. All information disclosed to the state or any agent of the state is CapTel Subcontractor Confidential information. Any disclosure of this information to unauthorized third parties is prohibited.
- (iii) Audits of CapTel Subcontractor Records
 The following are the only records that may be reviewed or copied by authorized representatives or personnel of the State. These records are Confidential Information. Any disclosure of these records by the State to unauthorized third parties is prohibited.
 - CapTel Subcontractor's customer service records for Captel users under this Customer
 - Call Detail Records (CDRs) that have been supplied to Sprint under this ABT for this Customer's Captel traffic.
 - CapTel Subcontractor's reports on the average monthly speed and accuracy testing scores for CapTel Subcontractor Captel CAs (not including individual detailed scores or any other related documents).
 - Such other records as CapTel Subcontractor and Sprint may mutually agree in writing.

The records that may be reviewed and copied do not include any information that is, in whole or in part, the property of any other CapTel

Subcontractor customer, including any other state Captel relay program, any other TRS Provider, any Captel user not under this Customer, or any of CapTel Subcontractor's or any of its Affiliates' financial, operational, internal or other information, or any other documents, methods, procedures, technical, confidential, proprietary, or trade secret information, or any other information of any kind unless specifically agreed to in writing by CapTel Subcontractor and Sprint.

6. **III.QQ PRICES** shall be amended and a clarification adopted so it reads as follows:

All prices, costs, terms and conditions outlined in the proposal shall remain fixed and valid commencing on the opening date of the proposal until an award is made (and for bidder receiving award prices shall remain as bid for the duration of the contract unless otherwise so stated in the contract) or the Request for Proposal is cancelled.

Sprint respectfully takes exception to any provision that requires Sprint to provide Most Favored Customer pricing. Sprint recognizes the State's buying power and strives to provide the most competitive pricing available. However, offering true most favored customer pricing presents several challenges for Sprint: (i) as a common carrier, Sprint is prohibited by law from unreasonably discriminating between similarly situated customers; (ii) offering such pricing may trigger provisions in other Sprint agreements compelling Sprint to provide credits or rebates to other customers or categories of customers, which may not be commercially feasible, thereby placing Sprint in breach or default; and (iii) providing most favored customer pricing is against Sprint corporate policy. Sprint will continue to offer highly competitive pricing and discounts for its services in a manner in which the prices Sprint charges its customers for the same services are not unreasonably dissimilar for similarly situated customers with like traffic patterns, volumes, commitment levels and the like.

Contractor also represents and warrants that all prices set forth in the contract and all prices in addition, which the contractor may charge under the terms of the contract, do not and will not violate any existing federal, state or municipal law or regulations concerning price discrimination and/or price fixing. Contractor agrees to hold the State harmless from any such violation. Prices quoted shall not be subject to increase throughout the contract period unless specifically allowed by these specifications.

7. **III.TT INDEMNIFICATION** shall be amended to read as follows:

1. General

Personal Injury, Death or Damage or Damage to Personal Property. The Contractor will indemnify and defend the State, its employees, agents, elected and appointed officials and their successors against all third party claims for damages, losses, liabilities, or expenses, including reasonable attorney's fees, arising directly from performance of this Contract and relating to personal injury, death, or damage to tangible personal property that is alleged to have resulted, in

whole or in part, from the negligence or willful misconduct of the Contractor or its subcontractors, directors, officiers, employees or authorized agents.

2. INTELLECTUAL PROPERTY

The Contractor will defend and pay all court awarded damages for claims enforceable in the United States alleging that Services as provided infringe any third party United States patent or copyright or contain misappropriated third party trade secrets. The Contractor's obligations under this Section do not apply to the extent that the alleged or actual infringement or violation is caused by: (i) functional or other specifications that were provided by or requested by the State, the State's continued use of infringing Services after the Contractor provides reasonable notice to the State of the infringement, or (ii) the State's use of the Services in a manner that causes the State and the Contractor to come into competition for third parties seeking to purchase Services. For any third party claim that the Contractor receives, or to minimize the potential for a claim, the Contractor may, at its sole option and expense, either procure the right for the State to continue using the Services, replace or modify the Services with comparable Services, or terminate the Services.

3. RIGHTS OF INDEMNIFIED PARTY

To be indemnified, the State must (A) give the Contractor prompt written notice of the claim, (B) give the Contractor full and complete authority, information and assistance for the claim's defense and settlement, and (C) not, by any act including but not limited to any admission or acknowledgement, materially prejudice the Contractor's ability to satisfactorily defend or settle the claim. The State shall cooperate with the Contractor in the defense and settlement of the claim and the Contractor will retain the right, at its option, to settle or defend the claim, at its own expense and with its own counsel; provided, however, that the State may at any time, upon written notice to Contractor, assume its own defense with exclusive authority to settle any claim made solely against it. Each party will bear its own related expenses.

4. PERSONNEL

The contractor shall, at its expense, indemnify and hold harmless the indemnified parties from and against any claim with respect to withholding taxes, worker's compensation, employee benefits, or any other claim, demand, liability, damage, or loss of any nature relating to any of the personnel provided by the contractor.

8. SECTION III.CCC LIMITATION OF LIABILITY is added as follows:

The Contractor being advised that the State of Nebraska asserts, pursuant to its Constitution, Art. XIII, Sec. 3, that a contractor doing business with the State of Nebraska may not limit its liability and such clause or provision is void, the Contract shall be amended to include the following:

(a) Direct Damages. Each party's maximum liability for damages caused by its failure to perform its obligations under this Agreement is limited to: (A) proven

direct damages for claims arising out of personal injury or death, or damage to real or tangible personal property, caused by the party's negligent or willful misconduct; or (B) proven direct damages for all other claims arising out of this Agreement, not to exceed in the aggregate, in any 12 month period, an amount equal to the State's total net payments for the affected products and services purchased in the 12 months prior to the event giving rise to the claim. The State's payment obligations and the Contractor's indemnification obligations under this Agreement are excluded from this provision.

(b) Consequential Damages. NEITHER PARTY WILL BE LIABLE FOR ANY CONSEQUENTIAL, INCIDENTAL, OR INDIRECT DAMAGES FOR ANY CAUSE OF ACTION, WHETHER IN CONTRACT OR TORT. CONSEQUENTIAL, INCIDENTAL, AND INDIRECT DAMAGES INCLUDE, BUT ARE NOT LIMITED TO, LOST PROFITS, LOST REVENUES, AND LOSS OF BUSINESS OPPORTUNITY, WHETHER OR NOT THE OTHER PARTY WAS AWARE OR SHOULD HAVE BEEN AWARE OF THE POSSIBILITY OF THESE DAMAGES.

9. Attachment 1.1, Cost Proposal

The State selects Option One Price Quotation, Traditional Relay Price Per Session Minute of Communications Assistant Work Time.

Sprint Communications Company, L.P.	The Commission
By: Uller mite	By: Keve Meradith
Name: Michaela Clairmonte	Name: STEVE MERADITH
Title: Manager, Contract Negotiations	Title: Executive Director
Date: <u>May 2, 2014</u>	Date: May 5, 2014

Sprint — Approved as to Legal Form

KAC - 1 May 2014

STATE OF NEBRASKA SERVICE CONTRACT AWARD

PAGE	ORDER DATE
1 of 2	05/01/14
BUSINESS UNIT	BUYER
14006400	MERADITH, STEPHEN D
ENDOR NUMBER: 5119264	

Nebraska Public Service Commission 1200 "N" Street, Suite 300 Lincoln, Nebraska 68508 P.O. Box 94927 Lincoln, Nebraska 68509-4927 Phone - 402-471-0211 Fax - 402-471-0254

CONTRACT NUMBER 60388 O4

VENDOR ADDRESS:

SPRINT COMMUNICATIONS COMPANY LP 12502 SUNRISE VALLEY DRIVE RESTON, VA 20196

AN AWARD HAS BEEN MADE TO THE VENDOR/CONTRACTOR NAMED ABOVE FOR THE SERVICES AS LISTED BELOW FOR THE PERIOD:

JULY 01, 2014 THROUGH JUNE 30, 2019

THIS CONTRACT IS NOT AN EXCLUSIVE CONTRACT TO FURNISH THE SERVICES SHOWN BELOW, AND DOES NOT PRECLUDE THE PURCHASE OF SIMILAR SERVICES FROM OTHER SOURCES.

THE STATE RESERVES THE RIGHT TO EXTEND THE PERIOD OF THIS CONTRACT BEYOND THE TERMINATION DATE WHEN MUTUALLY AGREEABLE TO THE VENDOR/CONTRACTOR AND THE STATE OF NEBRASKA.

Original/Bid Document 72617 O3

Contract to provide Telecommunications Relay Services to the State of Nebraska, Nebraska Public Service Commission, 1200 N Street, Suite 300, Lincoln, NE 68508, for the period effective July 1, 2014 through June 30, 2019.

The contract resulting from this Request for Proposal shall incorporate the following documents:

- 1. Amendment to Contract Award with the most recent dated amendment having the highest priority;
- 2. Contract Award and any attached Addenda;
- 3. The signed in ink Request for Proposal form and the Contractor's Proposal;
- 4. Amendments to RFP and any Questions and Answers; and
- 5. The original RFP document and any Addenda.

These documents constitute the entirety of the contract. Unless otherwise specifically stated in the contract amendment, in case of any conflict between the incorporated documents, the documents shall govern in the following order of preference with number one (1) receiving preference over all other documents and with each lower numbered document having preference over any higher numbered document: 1) Amendment to Contract Award with the most recent dated amendment having the highest priority, 2) Contract Award and any attached Addenda, 3) the signed Request for Proposal form and the Contractor's Proposal, 4) Amendments to RFP and any Questions and Answers, 5) the original RFP document and any Addenda.

CONTACT: Michaela Clairmonte, Manager, Contracts Negotiations & Management

PHONE: 703.433.8581 FAX: 866.515.0932

WAY !!		ALESSA COLLEGE	Start Name of the last	BULLIEF CONTROL STORY	
Line	Description	Quantity	Unit of Measure	Unit Price	Extended Price
1	CONTRACTUAL RELAY SERVICE	103,667.0000	М	1.6400	170,013.88
2	CONTRACTUAL RELAY SERVICE	88,117.0000	M	1.8400	162,135.28
3	CONTRACTUAL RELAY SERVICE	74,899.0000	M	1.9500	146,053.05
4	CONTRACTUAL RELAY SERVICE	63,664.0000	M	2.1500	136,877.60
5	CONTRACTUAL RELAY SERVICE	54,115.0000	M	2.2400	121,217.60

STATE OF NEBRASKA SERVICE CONTRACT AWARD

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PAGE	ORDER DATE
2 of 2	05/01/14
BUSINESS UNIT	BUYER
14006400	MERADITH, STEPHEN D

VENDOR NUMBER:

5119264

CONTRACT NUMBER 60388 O4

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Line	Description	Quantity	Unit of Measure	Unit Price	Extended Price
6	CAPTEL SERVICE	494,845.0000	M	1.7900	885,772.55
7	CAPTEL SERVICE	266,130.0000	M	1.8200	484,356.60
8	CAPTEL SERVICE	279,437.0000	M	1.8500	516,958.45
9	CAPTEL SERVICE	293,409.0000	М	1.8900	554,543.01
10	MEDIA AWARENESS CAMPAIGN	150,000.0000	EΑ	1.0000	150,000.00
	Total Order				3,327,928.02

Steve Meradith

(Buyer)

Executive Director

Appendix K: FCC's 2013 TRS Recertification Approving Nebraska Relay



Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

News Media Information 202-418-0500 Internet: http://www.foc.gov TTY: 1-888-835-5322

DA 13-1530

Released: July 8, 2013

NOTICE OF CERTIFICATION OF STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below, pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules. On the basis of the state applications received, the Bureau has determined that:

- The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;³
- (2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;⁴ and
- (3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.⁵

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program.

¹ For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

^{2 47} C.F.R. § 64.606(b).

^{3 47} U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

^{4 47} U.S.C. § 225(f)(2)(B).

^{5 47} C.F.R. § 64.606(d).

certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-12

Alabama Public Service Commission

State of Alabama

File No: TRS-47-12

Arkansas Deaf and Hearing Impaired

State of Arkansas

File No: TRS-32-12

California Public Utilities Commission

State of California

File No: TRS-48-12

Connecticut Department of Public Utility

State of Connecticut

File No: TRS-49-12 Public Service Commission

District of Columbia

File No: TRS-51-12

Georgia Public Service Commission

State of Georgia

File No: TRS-43-12

Idaho Public Service Commission

State of Idaho

File No: TRS-08-12

Indiana Telephone Relay Access Corporation

State of Indiana

File No: TRS-07-12

Kansas Relay Services, Inc. State of Kansas

File No: TRS-13-12

Louisiana Relay Administration Board

State of Louisiana

File No: TRS-33-12

Telecommunications Access of Maryland

State of Maryland

File No: TRS-19-12 Department of Commerce

State of Allaska

File No: TRS-02-12

Commission for the Deaf and Hard of Hearing

State of Arizona

File No: TRS-23-12

Colorado Public Utilities Commission

State of Colorado

File No: TRS-35-12

Delaware Public Service Commission

State of Delaware

File No: TRS-50-12

Florida Public Service Commission

State of Florida

File No: TRS-22-12

Hawaii Public Utilities Commission

State of Hawaii

File No: TRS-10-12

Illinois Commerce Commission

State of Illinois

File No: TRS-03-12

Iowa Utilities Board

State of Iowa

File No: TRS-52-12

Kentucky Public Service Commission

Commonwealth of Kentucky

File No: TRS-53-12

Maine Public Utilities Commission

State of Maine

File No: TRS-34-12

Department of Telecommunications and Energy

Commonwealth of Massachusetts

File No: TRS-54-12

Michigan Public Service Commission

State of Michigan

File No: TRS-55-12

Mississippi Public Service Commission

State of Mississippi

File No: TRS-56-12

Telecommunications Access Program

State of Montana

File No: TRS-25-12 Rolay Novada State of Nevada

File No: TRS-45-12

New Jersey Board of Utilities

State of New Jersey

File No: TRS-16-12

New York State Department of Public Service Department of Health and Human Service

State of New York

File No: TRS-12-12

Information Technology Department

State of North Dakota

File No: TRS-57-12

Oklahoma Telephone Association

State of Oklahoma

File No: TRS-58-12

Pennsylvania Bureau of Consumer Services

Commonwealth of Pennsylvania

File No: TRS-59-12

Division of Public Utilities and Carriers

State of Rhode Island

File No: TRS-11-12

South Carolina Office of Regulatory Staff

State of South Carolina

File No: TRS-20-12

Tennessee Regulatory Authority

State of Tennessee

File No: TRS-39-12

Minnesota Department of Commerce

State of Minnesota

File No: TRS-15-12

Missouri Public Service Commission

State of Missouri

File No: TRS-40-12

Nebraska Public Service Commission

State of Nebraska

File No: TRS-42-12

New Hampshire Public Service Commission

State of New Hampshire

File No: TRS-14-12

Commission for the Deaf and Hard of Hearing

State of New Mexico

File No: TRS-30-12

State of North Carolina

File No: TRS-37-12

Public Utilities Commission of Ohio

State of Ohio

File No: TRS-36-12

Oregon Public Utilities Commission

State of Oregon

File No: TRS-28-12

Telecommunications Regulatory Board

Puerto Rico

File No: TRS-62-12

Micronesian Telecommunications Corporation

Saipan

File No: TRS-60-12

Department of Human Services

State of South Dakota

File No: TRS-17-12

Texas Public Utility Commission

State of Texas

File No: TRS-61-12

Virgin Islands Public Service Commission

U.S. Virgin Islands

File No: TRS-44-12

Vermont Department of Public Service

State of Vermont

File No: TRS-27-12

Office of the Deaf and Hard of Hearing

State of Washington

File No: TRS-01-12

Wisconsin Department of Administration

State of Wisconsin

File No: TRS-09-12 Public Service Commission

State of Utah

File No: TRS-04-12

Department for the Deaf and Hard of Hearing

Commonwealth of Virginia

File No: TRS-06-12

Public Service Commission of West Virginia

State of West Virginia

File No: TRS-18-12

Division of Vocational Rehabilitation

State of Wyoming

The full text of this Public Notice and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: www.bcniweb.com or call (202) 488-5300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at https://apps.fcc.gov/ecfs// (insert docket No. 03-123 in the proceeding number fill-in block, and the state identification number, (e.g., TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This Public Notice can also be downloaded in Word and Portable Document Format (PDF) at http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs.

For further information regarding this Public Notice, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana.Wilson@fcc.gov. Appendix L: Substantive Changes to Nebraska TRS

September 25, 2017

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: Substantive Changes in TRS Services for the State of Nebraska CG DOCKET NO. 03-123.

Dear Ms. Dortch.

The Nebraska Public Service Commission (NPSC) submits the following substantive changes in TRS pursuant to 47 C.F.R. Part 64.606(f)(1);

- 1. Effective July 1, 2014 the Nebraska Public Service Commission awarded Sprint Relay a second contract term for offering relay services for the State of Nebraska. The contract provides for a five (5) period term effective July 1, 2014 through June 30, 2019 with no options to renew;
- 2. Effective for this same time period, Captioned Telephone (CapTel) TRS services was also provided for with Sprint as primary contractor and CTI, the sole provider of CapTel in the United States. CTI is a wholly-owned subsidiary of Ultratec. Two-line CapTel is also provided;
- 3. The rates for traditional relay with Sprint (session minutes-based) provides for annual increases as follows: FY 2014-15, \$1.64; FY 2015-16, \$1.84; FY 2016-17, \$1.95; FY 2017-18, \$2.15 and FY 2018-19, \$2.24. Rates for CapTel (conversation minutes-based) is \$1.79 for the years one and two with \$1.82 for FY 2016-17; \$1.85 for FY 2017-18 and \$1.89 for FY 2018-19;
- 4. Beginning September 4, 2017 through November 6, 2017 Buell Advertising in collaboration with Sprint was utilized to implement a television media awareness and outreach campaign for Nebraska Relay in the Lincoln & Hastings-Kearney market. The total cost of this campaign was \$20,000.00 shared equally with Sprint. Beginning in February 2018, the campaign will be extended statewide for all markets at a total contract cost of \$115,820 to be paid by the NPSC. The statewide campaign will air on a six-week schedule over the course of ten (10) weeks.

Sprint continues to meet all federal minimum standards since implementation of these substantive changes.

All other contact information as indicated per the Consumer and Governmental Affairs Bureau's website at https://www.fcc.gov/general/trs-state-and-territories for the Nebraska TRS program is current. Please contact me at (402) 471-0225 Voice and ask for Steve with any questions regarding the above or contact me by email at steve.stovall@nebraska.gov.

Sincerely,

Steven G. Stovall-Accountant Nebraska Public Service Commission